



1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA

3 CHURCH OF SCIENTOLOGY OF  
4 CALIFORNIA,

5 PLAINTIFF,

6 VS.

) NO. 83 5052R

7 MICHAEL J. FLYNN,

8 DEFENDANT.  
9  
10  
11  
12  
13  
14

15 DEPOSITION OF GERALD DAVID ARMSTRONG,  
16 TAKEN ON BEHALF OF THE PLAINTIFF, AT 261 SOUTH  
17 FIGUEROA STREET, SUITE 300, LOS ANGELES, CALIFORNIA,  
18 ON FRIDAY, FEBRUARY 8, 1985, AT 10:35 A.M., BEFORE  
19 VICKI ANNE MESHEKOW, CSR NO. 6212, NOTARY PUBLIC,  
20 PURSUANT TO NOTICE AND AGREEMENT.  
21  
22  
23  
24  
25  
26  
27  
28

1 APPEARANCES:

2  
3 FOR THE PLAINTIFF:

4 COHN, GLICKSTEIN, LURIE, OSTRIN,  
LUBELL & LUBELL  
5 BY: MARY K. O'MELVENY,  
ATTORNEY AT LAW  
6 1370 AVENUE OF THE AMERICAS  
NEW YORK, NY 10019  
7

8 FOR THE DEFENDANTS:

9 LEWIS, D'AMATO, BRISBOIS & BISGAARD  
10 BY: RAUL MARTINEZ, ESQ.  
261 SOUTH FIGUEROA STREET  
SUITE 300  
11 LOS ANGELES, CA 90012

12 ALSO PRESENT:

13 NEIL LEVIN  
14  
15  
16  
17  
18  
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## I N D E X

WITNESS	EXAMINATION	PAGE
GERALD D. ARMSTRONG	(BY MS. O'MELVENY)	5

NO EXHIBITS WERE OFFERED



LOS ANGELES, CALIFORNIA, FRIDAY, FEBRUARY 8, 1985

10:35 A.M.

GERALD DAVID ARMSTRONG,  
HAVING BEEN FIRST DULY SWORN, WAS  
EXAMINED AND TESTIFIED AS FOLLOWS:

EXAMINATION

BY MS. O'MELVENY:

Q. WOULD YOU STATE YOUR NAME AND ADDRESS  
FOR THE RECORD, PLEASE.

A. GERALD ARMSTRONG. ANY CORRESPONDENCE  
CAN BE SENT TO MY ATTORNEY JULIA DRAGOJEVIC, AT  
CANTOS & BUNCH, 5855 TOPANGA CANYON BOULEVARD IN  
WOODLAND HILLS.

BEFORE WE BEGIN, JUST A COUPLE THINGS  
SO WE CAN RESOLVE REAL QUICK.

I WOULD -- SEEING AS I KNOW NOTHING OF  
THE PARTICULARS OF THIS PARTICULAR ACTION AND BECAUSE  
I AM AN EXPERT IN THE SUBJECT, I WOULD REQUEST EXPERT  
WITNESS FEES. I WOULD ALSO REQUEST THAT SEEING AS I  
HAVE A GREAT DEAL OF DIFFICULTY ON OCCASION GETTING  
WITNESS FEES FROM THE ORGANIZATION THAT WE COULD IN  
ANTICIPATION OF THAT DRAW A CHECK IN ADVANCE.

Q. I WOULD -- SORRY. GO AHEAD.

A. ALSO, THE TRANSCRIPT I WOULD LIKE SENT

1 TO MY ATTORNEY. I WILL NOT GO SOMEWHERE TO SIGN THE  
2 TRANSCRIPT.

3 Q. THERE IS NO PROBLEM WITH THE  
4 TRANSCRIPT BEING SENT TO YOUR ATTORNEY.

5 LET ME MAKE A STATEMENT.

6 YOU ARE HERE TODAY NOT BECAUSE WE HAVE  
7 CALLED YOU AS A WITNESS BUT BECAUSE MICHAEL FLYNN,  
8 THE DEFENDANT, IN THIS ACTION HAS DESIGNATED YOU AS A  
9 TRIAL WITNESS ON HIS BEHALF IN HIS DEFENSE IN THIS  
10 CASE. SO, WE ARE TAKING YOUR DEPOSITION AS WE ARE  
11 ENTITLED TO DO UNDER THE FEDERAL RULES TO DISCOVER  
12 WHAT IT IS THAT YOU WILL BE TESTIFYING TO AT THE  
13 TRIAL OF THIS ACTION ON MR. FLYNN'S BEHALF. ANY  
14 FINANCIAL ARRANGEMENTS THAT YOU WOULD BE MAKING TO  
15 APPEAR AS AN EXPERT WITNESS WOULD BE BETWEEN YOU AND  
16 MR. FLYNN SINCE YOU ARE BEING DESIGNATED AS HIS  
17 WITNESS.

18 A. EXCEPT THAT YOU ON THIS OCCASION HAVE  
19 CALLED ME HERE. MR. FLYNN HASN'T AND HE DOESN'T CARE  
20 PARTICULARLY WHETHER OR NOT THIS GOES FORWARD OR NOT.  
21 SO --

22 Q. DID HE TELL YOU THAT?

23 A. WHAT?

24 Q. THAT HE DIDN'T CARE PARTICULARLY  
25 WHETHER YOUR DEPOSITION TODAY WENT FORWARD OR NOT.

26 MR. MARTINEZ: I WILL OBJECT. THAT MIGHT BE  
27 WITHIN THE ATTORNEY/CLIENT PRIVILEGE. I DON'T KNOW  
28 WHAT YOU --



1 MS. O'MELVENY: IS MR. FLYNN REPRESENTING YOU  
2 TODAY IN THIS DEPOSITION. HE'S NOT HERE.

3 MR. MARTINEZ: HE HAD A PHONE CONVERSATION  
4 WITH MR. FLYNN.

5 THE WITNESS: OBVIOUSLY HE'S NOT HERE SO HE'S  
6 NOT HERE AND THAT DOESN'T TAKE A LOT OF BRAINS TO  
7 LOOK AT. BUT, YOU ARE THE PEOPLE WHO CALLED ME HERE,  
8 THAT'S WHAT I'M SAYING. I DON'T KNOW WHAT MIKE FLYNN  
9 THINKS OF THE DEPOSITION OR NOT. YOU ARE THE PEOPLE  
10 WHO WANT ME HERE.

11 Q. THAT'S RIGHT. WE ARE TAKING YOUR  
12 DEPOSITION TODAY BECAUSE WE ARE ENTITLED TO DO SO  
13 UNDER THE FEDERAL RULES BECAUSE MR. FLYNN HAS  
14 DESIGNATED YOU AS A WITNESS WHO WILL TESTIFY ON HIS  
15 BEHALF AT THE TRIAL.

16 A. EXACTLY --

17 Q. WE WILL BE PERFECTLY WILLING TO PAY  
18 YOU THE REGULAR WITNESS FEE THAT IS DESIGNATED UNDER  
19 THE FEDERAL RULES BUT YOU ARE TALKING ABOUT EXPERT  
20 FEES AND SO ON AND THAT IS SOMETHING THAT I HAVE NO  
21 ABILITY TO MAKE ARRANGEMENTS WITH YOU FOR BECAUSE  
22 YOU'RE NOT TESTIFYING AS OUR EXPERT. YOU ARE  
23 TESTIFYING, IF AS AN EXPERT AT ALL, AS AN EXPERT FOR  
24 MR. FLYNN.

25 A. THE FINANCIAL ARRANGEMENTS I HAVE WITH  
26 MR. FLYNN ARE ANOTHER MATTER. HOWEVER, MY FEE IS 150  
27 BUCKS AN HOUR AND THAT'S WHAT I WOULD REQUEST.

28 Q. BUT THAT'S NOT --



1           A.           YOU ARE IN A POSITION -- YOUR CLIENT  
2 IS SITTING BESIDE YOU AND YOU CAN REACH YOUR CLIENT  
3 ON A MOMENT'S NOTICE AND I WOULD REQUEST THAT THAT BE  
4 DONE SO WE CAN PROCEED WITH THE DEPOSITION.

5           MR. MARTINEZ:   PERHAPS WE CAN PROCEED BY SOME  
6 AGREEMENT THAT YOU WILL ONLY ASK HIM QUESTIONS OF A  
7 PERCIPIENT NATURE AND NOT QUESTIONS OF AN EXPERT. I  
8 DON'T KNOW TO WHAT EXTENT YOU CAN DRAW A DISTINCTION.

9           MS. O'MELVENY:   FRANKLY, I DON'T UNDERSTAND  
10 WHAT MR. ARMSTRONG'S CONTENTION IS WITH REGARD TO  
11 BEING AN EXPERT.

12                       AS YOU KNOW, HE HAS BEEN DESIGNATED BY  
13 YOUR CLIENT AS A WITNESS AT TRIAL AND THAT'S THE  
14 REASON THAT WE HAVE SCHEDULED THIS DEPOSITION  
15 TOGETHER WITH OTHER DEPOSITIONS OF TRIAL WITNESSES.  
16 OBVIOUSLY, WE ARE NOT CALLING HIM AS AN EXPERT AND WE  
17 ARE NOT REQUIRED TO PAY HIM AS AN EXPERT.

18           Q.           ARE YOU CONTENDING THAT YOU WILL NOT  
19 GO FORWARD TODAY WITH YOUR DEPOSITION UNLESS YOU  
20 RECEIVE PAYMENT AS AN EXPERT?

21           A.           NO. BUT I WOULD LIKE IT ON THE RECORD  
22 THAT IN THAT I AM AN EXPERT IN THIS SUBJECT; THAT IS,  
23 THE PROPENSITY OF THE ORGANIZATION FOR ENGAGING IN  
24 THE TYPE OF CONDUCT WHICH IS -- HAS BEEN ALLEGED  
25 THROUGHOUT THIS WHOLE THING. AND IN THAT THE JUDGE  
26 IN LOS ANGELES COURT TOOK JUDICIAL NOTICE OF THE FACT  
27 THAT I WAS AN EXPERT IN THESE SUBJECTS. AND BECAUSE  
28 MY 15 YEARS OF EXPERIENCE ADDS UP TO THAT, I AM



1 MAKING A REQUEST.

2 MR. MARTINEZ: HE IS RESERVING HIS RIGHTS.

3 MS. O'MELVENY: IT IS A REQUEST THAT YOU  
4 SHOULD FEEL FREE TO MAKE TO MR. FLYNN WHO WOULD BE  
5 THE ONLY PARTY IN THIS ACTION WHO WOULD BE  
6 DESIGNATING YOU AS AN EXPERT.

7 MR. MARTINEZ: OR TO THE COURT.

8 THE WITNESS: THE OTHER THING IS WHATEVER YOU  
9 INTEND TO PAY ME I WOULD -- I'VE HAD A GREAT DEAL OF  
10 DIFFICULTY GETTING PAYMENTS OUT OF THE ORGANIZATION.  
11 THEY REFUSE TO PAY MY DEMANDS SO I WOULD REQUEST THAT  
12 YOU CUT A CHECK NOW. I WON'T WAIT --

13 MS. O'MELVENY: WHY DON'T WE HAVE A DISCUSSION  
14 OFF THE RECORD.

15 (BRIEF DISCUSSION HELD OFF THE RECORD)

16 MS. O'MELVENY: YOU SHOULD MAKE A STATEMENT  
17 ON THE RECORD THAT YOU RESIDE "X" MILES FROM HERE AND  
18 MAKE THAT STATEMENT UNDER PENALTY OF PERJURY AND THEN  
19 WE WILL MAKE A DECISION.

20 THE WITNESS: I WILL MAKE THE STATEMENT THAT I  
21 TRAVELED 70 MILES TO GET HERE AND I AM GOING TO  
22 TRAVEL 70 MILES TO LEAVE HERE. AND I WOULD REQUEST  
23 140 MILES, THEREFORE, BE PAID.

24 BY MS. O'MELVENY:

25 Q. IS IT YOUR TESTIMONY THAT THE 70 MILES  
26 YOU HAVE TRAVELED TO GET HERE IS FROM YOUR RESIDENCE?

27 A. YOU SUPPOSE SOMETHING.

28 Q. DO YOU RESIDE 70 MILES AWAY?



1 A. NO, I DON'T.

2 DO I RESIDE 70 MILES AWAY? I DON'T  
3 RESIDE ANYWHERE. I TRAVELED 70 MILES TO GET HERE. I  
4 HAVE NO RESIDENCE.

5 MS. O'MELVENY: LET'S TAKE A SHORT BREAK.

6 (BRIEF RECESS)

7 MS. O'MELVENY: I WANT THE RECORD TO INDICATE  
8 THAT I AM GOING TO HAND MR. ARMSTRONG \$35,  
9 REPRESENTING THE WITNESS FEES CALLED FOR BY THE  
10 FEDERAL RULES AND I AM GOING TO MAKE A REQUEST THAT  
11 MR. MARTINEZ ADVISE ME OF THE AMOUNT THAT HE BELIEVES  
12 MR. ARMSTRONG'S 140 MILEAGE REQUEST AMOUNTS TO AND I  
13 WILL WRITE MR. MARTINEZ'S LAW FIRM A CHECK AND HE MAY  
14 TURN THAT OVER TO THE WITNESS IF HE BELIEVES THE  
15 WITNESS IS ENTITLED TO THE MILEAGE FEE.

16 MR. MARTINEZ: WHAT IS THE MILEAGE RATE? 10  
17 CENTS A MILE?

18 THE WITNESS: I THINK IT'S 20 CENTS.

19 MS. O'MELVENY: I WOULD LIKE TO HAVE A  
20 XEROXED COPY OF THE CHECK.

21 MR. MARTINEZ: WHY DON'T WE GET STARTED AND WE  
22 WILL DO THAT ON THE NEXT BREAK.

23 MS. O'MELVENY: IT IS MY UNDERSTANDING THAT  
24 THE WITNESS WILL NOT TESTIFY UNLESS HE HAS THE CHECK.  
25 BY MS. O'MELVENY:

26 Q. MR. ARMSTRONG, YOU ARE FAMILIAR WITH THE  
27 DEPOSITION PROCEDURE, I GATHER?

28 A. RIGHT.



1 Q. YOU HAVE TESTIFIED AT DEPOSITIONS  
2 BEFORE?

3 A. OH, YES.

4 Q. SO YOU KNOW THAT THE TESTIMONY YOU ARE  
5 GIVING IS UNDER OATH; IS THAT CORRECT?

6 A. YES.

7 Q. AND YOU KNOW THAT ANY CHANGES THAT YOU  
8 MAKE IN YOUR TESTIMONY AFTER YOU RECEIVE A TRANSCRIPT  
9 OF IT CAN BE COMMENTED ON BY COUNSEL; IS THAT CORRECT?

10 A. YES.

11 Q. YOU KNOW THAT IT IS IMPORTANT TO  
12 ANSWER ALL OF THE QUESTIONS YOU ARE ASKED TRUTHFULLY  
13 AND COMPLETELY; IS THAT CORRECT?

14 A. YES.

15 Q. ARE YOU UNDER ANY MEDICATION TODAY?

16 A. NO.

17 Q. IS THERE ANY REASON THAT YOU CAN'T  
18 TESTIFY FULLY, TRUTHFULLY AND COMPLETELY TODAY?

19 A. I KNOW OF NONE.

20 Q. DO YOU HAVE AN ARRANGEMENT WITH THE  
21 DEFENDANT, MICHAEL FLYNN, IN THIS ACTION TO TESTIFY  
22 IN LAWSUITS?

23 A. I DON'T UNDERSTAND YOUR QUESTION.

24 MR. MARTINEZ: OBJECT. IT'S VAGUE AND  
25 AMBIGUOUS.

26 BY MS. O'MELVENY:

27 Q. DO YOU HAVE ANY ARRANGEMENT WITH THE  
28 DEFENDANT, MICHAEL FLYNN, TO TESTIFY IN THIS LAWSUIT?

1           A.           I THINK THE FACT THAT I'M HERE  
2 INDICATES THAT I AM WILLING TO DO THAT.

3           Q.           HAS MR. FLYNN OFFERED TO PAY YOU TO  
4 TESTIFY IN THIS LAWSUIT?

5           A.           I HAVE NOT GONE OVER THE DETAILS WITH  
6 MR. FLYNN. HOWEVER, THAT SEEMS UNLIKELY AT THIS  
7 POINT.

8           Q.           HAVE YOU MADE A REQUEST TO THE  
9 DEFENDANT THAT HE PAY YOU TO TESTIFY IN THIS LAWSUIT?

10          A.           SOMETIMES I DO PRO BONO WORK.

11          MS. O'MELVENY: WOULD YOU READ BACK THE  
12 QUESTION, PLEASE.

13                       (RECORD READ)

14          THE WITNESS: NO. I MADE A REQUEST TO THE  
15 PLAINTIFF.

16 BY MS. O'MELVENY:

17          Q.           HAVE YOU SPOKEN TO MR. FLYNN ABOUT THE  
18 TESTIMONY YOU WILL GIVE AT THE TRIAL OF THIS LAWSUIT?

19          A.           I DON'T UNDERSTAND YOUR QUESTION.

20          MR. MARTINEZ: I THINK IT IS AN IMPROPER  
21 QUESTION. IT IS OBVIOUSLY AN ATTORNEY/CLIENT  
22 PRIVILEGE.

23          MS. O'MELVENY: MR. FLYNN IS NOT APPEARING  
24 PER SE IN THIS LAWSUIT, AS I UNDERSTAND IT.

25 BY MS. O'MELVENY:

26          Q.           HAVE YOU AND MR. FLYNN DISCUSSED THE  
27 TESTIMONY YOU WILL BE GIVING IN THIS LAWSUIT?

28          A.           YOU KNOW, I THINK IT'S COMPLETELY



1 IRRELEVANT FOR ONE THING AND, YOU KNOW, MR. FLYNN HAS  
2 GONE THROUGH A RATHER LENGTHY TRIAL WITH ME. HE  
3 KNOWS ALL THE DETAILS WHICH YOU AND YOUR CLIENT KNOW,  
4 SO WHAT HE EXACTLY CHOOSES IN SPECIFICS AS TO WHAT  
5 PART OF THAT HE WILL USE, I REALLY DON'T KNOW. I  
6 DON'T KNOW EVEN WHAT THIS PARTICULAR CASE IS REALLY  
7 ABOUT. I HAVE NEVER EVEN SEEN THE CAPTION.

8 MS. O'MELVENY: I MOVE TO STRIKE THE ANSWER  
9 AS NONRESPONSIVE.

10 BY MS. O'MELVENY:

11 Q. DID YOU SPEAK TO ANYONE TO PREPARE FOR  
12 YOUR DEPOSITION TODAY?

13 A. I DON'T UNDERSTAND YOUR QUESTION.

14 Q. DID YOU DISCUSS THE TESTIMONY YOU  
15 WOULD BE GIVING TODAY WITH ANYONE?

16 A. NO.

17 Q. DID YOU REVIEW ANY DOCUMENTS IN  
18 PREPARATION FOR YOUR APPEARANCE HERE TODAY?

19 A. NO.

20 Q. WHAT IS YOUR CURRENT OCCUPATION?

21 A. I'M AN EXPERT WITNESS.

22 Q. AND DO YOU PERFORM EXPERT WITNESS  
23 SERVICES FOR MR. FLYNN?

24 A. YES.

25 Q. DO YOU PERFORM EXPERT WITNESS SERVICES  
26 FOR ANY OTHER ATTORNEYS?

27 A. I DON'T KNOW. I HAVE MANY TIMES FOR  
28 YOUR ATTORNEYS. THE ATTORNEYS THAT REPRESENT YOUR



1 CLIENT IN VARIOUS JURISDICTIONS. MANY, MANY TIMES.

2 Q. OTHER THAN TESTIFYING ON ISSUES  
3 PERTAINING TO SCIENTOLOGY ARE YOU EMPLOYED IN ANY  
4 CAPACITY?

5 A. I'M A WRITER.

6 Q. ARE YOU A FREELANCE WRITER?

7 A. I DON'T UNDERSTAND WHAT YOU MEAN BY  
8 THAT.

9 Q. ARE YOU EMPLOYED BY ANY PUBLISHING  
10 COMPANY --

11 A. NO.

12 Q. -- OR OTHER ENTITY AS A WRITER?

13 A. I SAID NO.

14 Q. YOU HAVE TO WAIT UNTIL SHE IS FINISHED  
15 TAKING DOWN THE QUESTION BEFORE YOU ANSWER.

16 WHEN DID YOU BEGIN YOUR EMPLOYMENT AS  
17 A WRITER?

18 A. JULY '84.

19 Q. ARE YOU UNDER CONTRACT TO ANY  
20 PUBLISHING COMPANY?

21 A. NO.

22 Q. HAVE YOU PUBLISHED ANY BOOKS?

23 A. NO.

24 Q. PRIOR TO JULY 1984 WHAT WAS YOUR  
25 OCCUPATION?

26 A. I WAS A DEFENDANT IN A TRIAL.

27 Q. WERE YOU EMPLOYED BY ANYONE PRIOR TO  
28 1984, JULY 1984?

1 A. YES.

2 Q. BY WHOM?

3 A. YOU WANT MY -- THE WHOLE LITANY OF  
4 JOBS?

5 Q. YES, WHY DON'T WE DO THAT.

6 A. MY FIRST JOB I WAS ABOUT EIGHT YEARS  
7 OLD, I THINK, AND I GOT A JOB ROLLING UP NEWSPAPERS  
8 FOR A MOVING COMPANY AND I DID THAT FOR A COUPLE OF  
9 YEARS UNTIL I WAS ABOUT 12. AND WHEN I WAS 12 I GOT  
10 A JOB AS A NEWSPAPER BOY AND THAT WENT ON UNTIL I WAS  
11 APPROXIMATELY 18, DURING WHICH TIME I DID OTHER JOBS.  
12 I WORKED ON A RANCH UP IN PRINCETON, BRITISH  
13 COLUMBIA. AND THEN AFTER THAT I WORKED -- OH, I ALSO  
14 SPLIT WOOD ONE SUMMER FOR -- ON A FARM NEAR  
15 CHILLIWACK, BRITISH COLUMBIA. AND THEN I WORKED --  
16 I WORKED ON THE RANCH UP IN PRINCETON THREE SUMMERS  
17 AND TWO TIMES OVER THE CHRISTMAS HOLIDAYS. AND THEN  
18 I GOT A JOB IN A LAUNDRY AND I WORKED THERE  
19 THROUGHOUT ONE SUMMER AND THEN INTO THE NEXT YEAR.

20 BY THE WAY, MY JOBS ARE ABSOLUTELY AND  
21 COMPLETELY IRRELEVANT AND HAVE NOTHING WHATSOEVER TO  
22 DO WITH THIS CASE. WHERE I WORK HAS NOTHING TO DO  
23 WITH THIS CASE AND SO I THINK THAT IT'S JUST BULLSHIT  
24 THAT YOU ARE EVEN ASKING AS TO WHAT JOB I DO OR WHAT  
25 JOB I DID. YOU KNOW VERY WELL WHAT JOBS I DID. I  
26 WAS IN SCIENTOLOGY. I WAS IN THE SEA <sup>ORG</sup> YORK FOR 11  
27 YEARS. AND YOU REALLY DON'T WANT TO KNOW THE JOBS  
28 THAT I DID.



1 NOT ONLY THAT, BUT YOUR CLIENT KNOWS EVERY  
2 DETAIL OF MY LIFE, INCLUDING HOW MANY PIGS I FUCKED.  
3 EVERY DETAIL AND THEY USE IT. SO I THINK IT IS JUST  
4 OUT OF LINE FOR YOU TO EVEN CARE ABOUT WHAT JOBS I DO.  
5 SO GO AHEAD.

6 Q. HAVE YOU GIVEN US YOUR EMPLOYMENT  
7 HISTORY PRIOR TO THE TIME YOU BECAME A MEMBER OF THE  
8 CHURCH OF SCIENTOLOGY?

9 A. WELL, I'VE CERTAINLY GIVEN YOU A LOT  
10 OF IT. EVERY DETAIL. YOUR CLIENT HAS EVERY DETAIL  
11 OF MY LIFE.

12 Q. MR. ARMSTRONG --

13 A. YOUR CLIENT WILL PROVIDE YOU WITH  
14 EVERY DETAIL. YOU DON'T NEED IT AND IT HAS NOTHING  
15 TO DO WITH SOME SPEECH MICHAEL FLYNN MAY HAVE GIVEN  
16 IN -- SOMETIME, SOMEWHERE.

17 Q. LET ME JUST INDICATE, AGAIN, THAT I AM  
18 ENTITLED AS THE ATTORNEY IN THIS ACTION TO INQUIRE ON  
19 CERTAIN GENERAL MATTERS REGARDING YOUR OCCUPATIONAL  
20 HISTORY, YOUR BACKGROUND AND REGARDLESS OF WHETHER  
21 YOU THINK THE CLIENT HAS INFORMATION OR NOT I AM  
22 TRYING TO ASK VERY SIMPLE ROUTINE QUESTIONS THAT ARE  
23 ASKED OF ALL WITNESSES AND I WOULD APPRECIATE YOUR  
24 COOPERATION --

25 A. YOU TELL ME --

26 Q. -- IN ANSWERING THEM.

27 A. I DON'T THINK THEY'RE ASKED OF ALL  
28 PEOPLE. YOU KNOW, YOU JUST -- YOU KNOW EVERY DETAIL,



1 SO IT'S JUST PURE HARASSMENT AND BULLSHIT TO CONTINUE  
2 ON WITH THIS CHARADE.

3 Q. WHAT IS YOUR AGE?

4 A. 38.

5 Q. HAVE YOU EVER BEEN CONVICTED OF A  
6 CRIME?

7 A. NO.

8 Q. HAVE YOU EVER MADE A FALSE STATEMENT  
9 UNDER OATH?

10 A. NO.

11 Q. WHEN DID YOU BECOME A MEMBER OF  
12 SCIENTOLOGY?

13 A. 1969.

14 Q. WERE YOU A MEMBER OF THE CHURCH OF  
15 SCIENTOLOGY <sup>OF</sup> IN CALIFORNIA?

16 A. YOU TELL ME WHERE THAT IS. <sup>WHAT</sup>

17 Q. DO YOU KNOW WHETHER YOU WERE EVER A  
18 MEMBER OF THE CHURCH OF SCIENTOLOGY OF CALIFORNIA?

19 A. IN THAT THE CHURCH OF SCIENTOLOGY OF  
20 CALIFORNIA WAS ALL SCIENTOLOGY EVERYWHERE AT SOME  
21 TIME CORPORATELY OR IN REALITY OR WHETHER OR NOT THEY  
22 WERE ALL, YOU KNOW, FOLLOWERS OF L. RON HUBBARD, YES.  
23 WHAT CHURCH OF SCIENTOLOGY OF CALIFORNIA MEANS,  
24 THAT'S ANOTHER --

25 Q. IS IT YOUR TESTIMONY THAT THE CHURCH  
26 OF SCIENTOLOGY OF CALIFORNIA ACTED ON BEHALF OF ALL  
27 SCIENTOLOGY ENTITIES?

28 A. CHURCH OF SCIENTOLOGY OF CALIFORNIA



1     ACTED ON BEHALF OF L. RON HUBBARD, IF THAT'S WHAT YOU  
2     MEAN. IT CONTROLLED THE WHOLE THING. IF YOU WERE A  
3     SCIENTOLOGIST YOU WERE A PART OF THAT BODY WHICH WAS  
4     THE CHURCH OF SCIENTOLOGY OF CALIFORNIA AT THAT TIME.  
5     THAT WAS THE CORPORATE TITLE GIVEN TO THIS OCTOPUS.

6             Q.           AND BY "AT THAT TIME" AT WHAT TIME  
7     FRAME ARE YOU REFERRING TO?

8             A.           1969.

9             Q.           WAS THAT TRUE THROUGHOUT THE TIME YOU  
10    WERE INVOLVED IN SCIENTOLOGY?

11            A.           THE TRUTH WAS, THAT THE WHOLE THING  
12    WAS UNDER THE CONTROL OF L. RON HUBBARD. THE REALITY  
13    OF, YOU KNOW, ASIDE FROM WHAT CORPORATE TITLES YOU  
14    WANT TO GIVE TO THIS THING, THIS ENTITY, BECAUSE  
15    THERE WERE VARIOUS OTHER THINGS WHICH FORM UP ALONG  
16    THE WAY, OPERATION AND TRANSPORT CORPORATION LIMITED,  
17    WESTERN STATE SCIENTIFIC COMMUNICATIONS ASSOCIATION,  
18    PERFECT PICTURES, NORTON <sup>WISHNOW'S</sup> ~~CANO'S~~ FRIENDS, SCOTTISH  
19    HIGHLAND QUIETUDE CLUB, ALL OF THESE THINGS WERE THE  
20    SAME GROUP. IT'S THE SAME THING. IT'S ALL THE SAME  
21    THING. THERE IS NO DIFFERENTIATION. IT'S ALL  
22    CONTROLLED BY L. RON HUBBARD. CALL IT WHAT THOU WILT,  
23    IT'S ALL THE SAME THING.

24            SO IF AT SOME GIVEN TIME THERE EXISTED AN  
25    ENTITY OF THE CHURCH OF SCIENTOLOGY OF CALIFORNIA AND  
26    THAT WAS THE -- WHAT THEY CALLED THE, YOU KNOW, THE  
27    MOTHER CHURCH OR THE CORPORATE HEADQUARTERS OR THE  
28    WHATEVER, THAT'S WHAT IT WAS.



1                   NOW, IN THE END OF 1981 THEY -- MR.  
2                   HUBBARD AND COMPANY CREATED OTHER CORPORATIONS AND  
3                   DEVALUED THE POSITION OF CHURCH OF SCIENTOLOGY OF  
4                   CALIFORNIA DOWN TO WHERE IT HAS BECOME A RELATIVELY  
5                   SMALL PIECE OF THE WHOLE PUZZLE. BUT THERE WAS A  
6                   TIME WHEN IT WAS THE VEHICLE WITH WHICH MR. HUBBARD  
7                   CONTROLLED THE WHOLE OPERATION. NOW IT IS SIMPLY A  
8                   PART WHICH IS CONTROLLED IN THE SAME MANNER VIA  
9                   SEPARATE DIFFERENT CORPORATIONS.

10                  MS. O'MELVENY:     MOVE TO STRIKE THE WITNESS'  
11                  TESTIMONY AS NONRESPONSIVE.

12                  COULD YOU READ BACK THE QUESTION.

13                  THE WITNESS:     I THINK IT WAS A VERY ACCURATE  
14                  STATEMENT AS TO THE WAY IT IS SET UP AND WHERE IT WAS  
15                  AT DIFFERENT TIMES.

16                  (RECORD READ)

17                  BY MS. O'MELVENY:

18                  Q.           DURING THE TIME YOU WERE INVOLVED IN  
19                  SCIENTOLOGY, MR. ARMSTRONG, WAS THE CHURCH OF  
20                  SCIENTOLOGY OF CALIFORNIA THE MOTHER CHURCH?

21                  A.           WELL, THAT'S THE -- OSTENSIBLY, YES.  
22                  BECAUSE THEN YOU HAVE TO GET DOWN TO, YOU KNOW, WAS  
23                  IT INDEED A CHURCH. WAS IT INDEED THE MOTHER CHURCH.  
24                  WHAT IS THE REALITY OF IT. IF YOU WOULD, YOU KNOW,  
25                  SKIP THE SUGARCOATING ON THE ORGANIZATION YOU SIMPLY  
26                  GET DOWN TO EVERYONE WORKED FOR L. RON HUBBARD AND  
27                  THAT'S THE ONLY THING YOU HAVE TO TALK ABOUT IS WHAT  
28                  DID ANYONE WHO CALLED HIMSELF A SCIENTOLOGIST OR WHO



1 WAS AN AGENT OF L. RON HUBBARD, WHAT DID HE DO DURING  
2 GIVEN TIMES AND THE HELL WITH THE CORPORATE SHAM.

3 MS. O'MELVENY: I MOVE TO STRIKE THE WITNESS'  
4 TESTIMONY AFTER "OSTENSIBLY YES."

5 THE WITNESS: I MOVE TO REINSTATE IT. IT WAS  
6 A GREAT ANSWER.

7 BY MS. O'MELVENY:

8 Q. WHAT POSITIONS DID YOU HOLD IN  
9 SCIENTOLOGY?

10 A. I THINK THAT THAT IS COMPLETELY  
11 IRRELEVANT. YOUR CLIENT HAS EVERY POSSIBLE THING  
12 THAT I DID IN SCIENTOLOGY. EVERY DETAIL OF MY LIFE  
13 FOR 13 YEARS.

14 MR. MARTINEZ: IT IS ALSO VAGUE AS TO WHAT YOU  
15 MEAN BY SCIENTOLOGY. CHURCH OF SCIENTOLOGY OF  
16 CALIFORNIA OR WHAT ENTITY?

17 MS. O'MELVENY: MY UNDERSTANDING OF THE  
18 WITNESS' TESTIMONY IS THAT HE CAN'T DETERMINE WHETHER  
19 HE WAS -- WHETHER HE HELD A POSITION IN THE CHURCH OF  
20 SCIENTOLOGY OF CALIFORNIA.

21 THE WITNESS: I THINK THAT IS AN ABSOLUTELY  
22 SCURRILOUS STATEMENT TO MAKE AND YOU DON'T MEAN IT AT  
23 ALL.

24 BY MS. O'MELVENY:

25 Q. DID YOU HOLD ANY POSITIONS IN THE  
26 CHURCH OF SCIENTOLOGY OF CALIFORNIA, MR. ARMSTRONG?

27 A. I WILL TALK ABOUT POSITIONS WHICH I  
28 HELD IN THAT.



1 DO YOU MEAN NOW THAT YOU ARE WILLING  
2 TO INCORPORATE WITHIN THE CHURCH OF SCIENTOLOGY OF  
3 CALIFORNIA ALL THOSE ENTITIES THAT I NAMED?

4 Q. I'M ASKING YOU FOR YOUR TESTIMONY ON  
5 THE SUBJECT OF WHETHER YOU HELD ANY POSITIONS WITHIN  
6 THE CHURCH OF SCIENTOLOGY OF CALIFORNIA?

7 A. YES.

8 Q. COULD YOU TELL US WHAT POSITIONS YOU  
9 HELD?

10 A. YOU TELL ME FIRST IF YOU ARE WILLING  
11 TO ACCEPT THAT EVERYWHERE I WORKED WAS THE CHURCH OF  
12 SCIENTOLOGY OF CALIFORNIA, ALTER EGO L. RON HUBBARD?

13 Q. MR. ARMSTRONG, I'M ASKING FOR YOUR  
14 TESTIMONY REGARDING THE POSITIONS YOU HELD, IF ANY,  
15 WITH THE CHURCH OF SCIENTOLOGY OF CALIFORNIA.

16 MR. MARTINEZ: I AM GOING TO OBJECT TO THE  
17 QUESTION AS VAGUE AND AMBIGUOUS. I THINK IT  
18 MISSTATES HIS PRIOR TESTIMONY. I THINK WHAT HE IS  
19 TRYING TO SAY IS THE CHURCH OF SCIENTOLOGY OF  
20 CALIFORNIA IS AN ALTER EGO FOR L. RON HUBBARD AND A  
21 LOT OF OTHER ORGANIZATIONS WERE AN ALTER EGO FOR L.  
22 RON HUBBARD.

23 THE WITNESS: SO IF YOU SIMPLY WANT A LIST OF  
24 ALL THE POSITIONS THAT I HELD CONNECTED WITH  
25 SCIENTOLOGY OR L. RON HUBBARD FROM THE BEGINNING --  
26 IS THAT WHAT YOU WANT?

27 BY MS. O'MELVENY:

28 Q. ARE YOU UNABLE TO ANSWER THE QUESTION



1 AS IT IS CURRENTLY PHRASED?

2 MR. MARTINEZ: DO YOU WANT TO HEAR THE  
3 QUESTION AGAIN?

4 THE WITNESS: I AM ABLE TO GIVE YOU A  
5 DAY-TO-DAY RUN DOWN OF ALL THE POSITIONS I HELD. I  
6 OBJECT TO DOING IT BECAUSE IT'S IRRELEVANT. AND  
7 BECAUSE I HAVE ALREADY GIVEN THIS TESTIMONY PROBABLY  
8 A DOZEN TIMES IN VARIOUS JURISDICTIONS AND TO YOUR  
9 CLIENT AND THEY HAVE EVERY DETAIL OF IT.

10 NOT ONLY THAT, THEY HAVE MY PERSONAL RECORDS.  
11 HOWEVER, I -- IF YOU MEAN HAVE I FORGOTTEN ALL THOSE  
12 THINGS, NO I HAVEN'T. SO I AM ABLE TO DO IT. AND IT  
13 WILL BE THE SAME AS I'VE GIVEN THE OTHER DOZEN TIMES.  
14 IF YOU WISH TO UTILIZE THE TIME IN THAT MANNER, I'M  
15 QUITE WILLING TO.

16 BY MS. O'MELVENY:

17 Q. WOULD YOU TELL US WHAT POSITIONS YOU  
18 HAVE HELD WITHIN THE CHURCH OF SCIENTOLOGY?

19 A. THE FIRST POSITION THAT I HELD WAS  
20 ASSISTANT COM/COURSE SUPERVISOR. THE SECOND POSITION

21 Q. WHEN WAS THAT?

22 A. YOU WANT THE DATES, TOO, FOR EACH ONE?

23 Q. TO THE BEST OF YOUR ABILITY TO GIVE ME  
24 THE DATES, YES.

25 A. 1969.

26 THEN I WAS THE -- A REGISTRAR, 1970.  
27 I WAS A BOOK SALESMAN, 1970. I WAS A LETTER WRITER,  
28 1970. I WAS A MIMEOGRAPH OPERATOR, 1970. I WAS THE



1       TREASURY DEPARTMENT HEAD, 1970. I GAVE LECTURES,  
2       1970. I WAS A DEPUTY E.D. 1970.

3               Q.           WHAT DOES E.D. STAND FOR?

4               A.           EXECUTIVE DIRECTOR.

5                       I WAS THE DISHWASHER, 1971. I WAS A --

6               Q.           DO YOU KNOW -- EXCUSE ME.

7                       DO YOU KNOW WHETHER ANY OF THE  
8       POSITIONS YOU IDENTIFIED AS HOLDING IN 1970 WERE  
9       POSITIONS WITHIN THE CHURCH OF SCIENTOLOGY OF  
10      CALIFORNIA?

11              A.           ALL OF THESE POSITIONS WHICH I'VE  
12      DESCRIBED SO FAR ULTIMATELY WERE UNDER THE CONTROL OF  
13      L. RON HUBBARD. AND L. RON HUBBARD CONTROLLED ALL OF  
14      THOSE POSITIONS VIA THE ENTITY OF THE CHURCH OF  
15      SCIENTOLOGY OF CALIFORNIA. SO, IN THAT SENSE, YES, I  
16      WAS WORKING FOR CHURCH OF SCIENTOLOGY OF CALIFORNIA.  
17      THEY COULD HAVE AT WILL ORDERED ME TO DO WHAT THEY  
18      WANTED. SO, IN THAT SENSE, YES, L. RON HUBBARD COULD  
19      HAVE AS WELL.

20              MS. O'MELVENY: I MOVE TO STRIKE THE ANSWER  
21      AS NONRESPONSIVE.

22      BY MS. O'MELVENY:

23              Q.           DO YOU KNOW WHETHER OR NOT ANY OF  
24      THOSE POSITIONS WERE WITH THE CHURCH OF SCIENTOLOGY  
25      OF CALIFORNIA?

26              A.           I THINK THAT I'VE BEEN FAIRLY PRECISE  
27      IN THE WAY THAT THE ORGANIZATION FUNCTIONED AND IS.  
28      NOW, IF YOU DO NOT WANT ME TO PROCEED WITH MY LIST OF



1 OCCUPATIONS ON THE BASIS THAT --

2 Q. I DO WANT YOU TO PROCEED. I AM ASKING  
3 YOU A VERY PRECISE QUESTION. IF YOU CAN'T ANSWER IT,  
4 THEN YOU CAN'T ANSWER IT, THAT'S ALL.

5 MR. MARTINEZ: HE HAS GIVEN YOU A RESPONSE.  
6 WHETHER IT'S NONRESPONSIVE IS NOT THE ISSUE AT THIS  
7 POINT. I DON'T THINK HE IS GOING TO CHANGE HIS  
8 ANSWER.

9 THE WITNESS: IF YOU CAN COME TO AN AGREEMENT  
10 THAT ALL SCIENTOLOGY IS THE CHURCH OF SCIENTOLOGY OF  
11 CALIFORNIA, THEN I'M QUITE WILLING TO SAY THAT, YEAH,  
12 THEY ALL WERE. WHETHER OR NOT -- YOU KNOW, I WAS  
13 EMPLOYED BY OPERATION AND TRANSPORT FUCKING  
14 CORPORATION. WAS <sup>NOT</sup> AT THE CHURCH OF SCIENTOLOGY? IT  
15 WAS A PANAMANIAN BUSINESS <sup>MANAGEMENT</sup> CORPORATION. SO ARE YOU  
16 GOING TO SAY, "WELL, THAT'S NOT THE CHURCH OF  
17 SCIENTOLOGY OF CALIFORNIA". IT ALL WORKED FOR L. RON  
18 HUBBARD. L. RON HUBBARD CONTROLLED THE CHURCH OF  
19 SCIENTOLOGY AND IT WAS ALL THE SAME THING.

20 MR. MARTINEZ: TALK A LITTLE SLOWER. THE  
21 COURT REPORTER IS HAVING TROUBLE GETTING YOU.

22 MS. O'MELVENY: YES.

23 BY MS. O'MELVENY:

24 Q. IS IT BASICALLY YOUR TESTIMONY THAT  
25 THE CHURCH OF SCIENTOLOGY OF CALIFORNIA RAN  
26 EVERYTHING OR CONTROLLED EVERYTHING; IS THAT  
27 BASICALLY --

28 A. L. RON HUBBARD RAN EVERYTHING AND



1 CONTROLLED EVERYTHING AND FRANKLY THAT ISSUE HAS BEEN  
2 LITIGATED AND IT'S OVER AND DONE WITH. I WORKED FOR  
3 L. RON HUBBARD. L. RON HUBBARD CONTROLLED EVERYTHING.  
4 WHAT HE CHOSE TO CALL IT -- IF HE CHOSE TODAY YOU'RE  
5 BUSINESS MANAGEMENT CORPORATION, TOMORROW YOU'RE THE  
6 SCOTTISH HIGHLAND QUIETUDE CLUB, IT'S ALL THE SAME  
7 THING.

8 Q. YOU WERE TELLING US THAT YOU WERE  
9 EMPLOYED AS A DISHWASHER IN 1971. WHAT OTHER  
10 POSITIONS HAVE YOU HELD WITHIN THE SCIENTOLOGY?

11 A. I WAS DECK PROJECT FORCE MEMBER.

12 Q. THIS IS ALSO IN 1971?

13 A. YES.

14 ASSISTANT STORESMAN.

15 Q. ALSO IN 1971?

16 A. UH-HUH. ALL OF THESE UNTIL I SAY '72  
17 ARE IN '71.

18 I WAS THE SHIP'S BOATS AND TRANSPORT  
19 IN CHARGE. I WAS THE SHIP'S DRIVER. IN 1972 I  
20 BECAME THE ASSISTANT SHIP'S REPRESENTATIVE AND THEN I  
21 BECAME THE SHIP'S REPRESENTATIVE UNTIL 1974. AT  
22 WHICH TIME I HAD A PUBLIC RELATIONS POST IN THE PORT  
23 CAPTAIN'S OFFICE. AND THEN I BECAME THE PORT CAPTAIN  
24 AND THEN I BECAME A PORT SET-UP MISSIONAIRE.

25 IN 1974 I ALSO BECAME THE  
26 INTELLIGENCE OFFICER ON BOARD THE SHIP UNTIL 1975  
27 WHEN --

28 Q. ON BOARD THE SHIP. CAN YOU IDENTIFY

1 THE SHIP, PLEASE?

2 A. THE SHIP WAS THE APOLLO.

3 1975 I WAS IN THE INTELLIGENCE BUREAU  
4 IN DAYTONA BEACH. THEN I BECAME --

5 Q. DID YOU HOLD <sup>THE</sup> POSITION IN THE  
6 INTELLIGENCE BUREAU?

7 A. IT WAS A -- RATHER UNCLEARLY DEFINED,  
8 BUT I WAS INTELLIGENCE OFFICER AND I BECAME Mimeo  
9 OPERATOR.

10 Q. ALSO IN '75?

11 A. YES. THEN I BECAME THE DEPUTY L.R.H.  
12 EXTERNAL COMMUNICATIONS AID AND I CONTINUED THAT  
13 UNTIL 1976. AND THEN I BECAME A PRISONER AND THEN I  
14 WAS GIVEN THE POST OF R.P.F. <sup>BOSTIAN</sup> ~~BOSTIAN~~.

15 Q. JUST A MINUTE. R.P.F.?

16 A. ~~BOSTIAN~~. <sup>BOSTIAN</sup>.

17 Q. WHERE WERE YOU A PRISONER, MR.  
18 ARMSTRONG?

19 A. WELL, ACTUALLY, I SUPPOSE I WAS A  
20 PRISONER THREE TIMES BUT THE ONE MAIN TIME WHEN I  
21 CONSIDERED WHEN I WAS ABSOLUTELY IMPRISONED WAS IN  
22 FIFIELD MANOR.

23 Q. COULD YOU SPELL THAT, PLEASE?

24 A. F-I-F-I-E-L-D M-A-N-O-R.

25 Q. AND THAT WAS IN 1976?

26 A. YES.

27 Q. AND THEN YOU BECAME THE R.P.F. <sup>BOSTIAN</sup> ~~BOSTIAN~~?

28 A. YES. THEN I WAS -- I BECAME R.P.F.



*MEMBER*  
1 SECTION MANAGER. THEN I BECAME AN R.P.F. SECTION IN  
2 ~~CHURCH.~~ THEN I BECAME THE ~~L.R.H. BOSTIAN.~~ *R.P.F. BOYD*

3 Q. ALL IN 1976?

4 A. NO. WE'RE GETTING INTO -- YES I GUESS  
5 THE END OF '76 THAT BRINGS US UP TO.

6 IN 1977 I BECAME THE ~~BOSTIAN~~ *BOSUN EMERITUS* AND  
7 ~~MARITUS.~~ THEN I BECAME A PROOF READER.

8 Q. THIS IS IN 1977?

9 A. YES. THEN I BECAME A MISSIONAIRE. IN  
10 1978 I BECAME SETS BUILDER. THEN I BECAME SETS IN -  
11 CHARGE.

12 Q. THIS IS STILL IN 1978?

13 A. YES. THEN I BECAME ASSISTANT CAMERA  
14 MAN. THEN I BECAME LOCATION SCOUT. THEN I BECAME  
15 ASSISTANT PRODUCER. THEN I BECAME SERVICES IN CHARGE.  
16 THEN I BECAME --

17 Q. STILL IN 1978?

18 A. UH-HUH.

19 THEN I BECAME R.P.F. MEMBER. THEN I  
20 BECAME R.P.F. M.A.A. THEN I BECAME R.P.F. MEMBER.  
21 THEN I BECAME R.P.F. M.A.A.

22 Q. WHAT DOES M.A.A. STAND FOR?

23 A. MASTER AT ARMS.

24 THEN WE GET INTO 1979. AND THEN I  
25 BECAME L.R.H. RENOVATIONS OR PURCHASER. THEN I  
26 BECAME DEPUTY OF L.R.H. RENOVATIONS IN CHARGE. AND  
27 THEN I BECAME L.R.H. RENOVATIONS IN-CHARGE. AND THEN  
28 I BECAME L.R.H. BIOGRAPHY RESEARCHER.

1 Q. ALSO IN 1979?

2 A. THAT WAS JUST THE BEGINNING OF 1980  
3 AND THAT WAS THE LAST POST I HELD UNTIL 1981.

4 Q. AND IN 19 --

5 A. THERE IS A NUMBER OF OTHER MISSIONS  
6 THAT I DID ALONG THE WAY AS WELL, BUT YOU CAN GO WITH  
7 THE POSTS THAT YOU GOT.

8 Q. AND IN 1981 YOU LEFT SCIENTOLOGY?

9 A. DOES ONE EVER LEAVE IT?

10 Q. DID YOU LEAVE SCIENTOLOGY IN 1981?

11 A. WELL, I DON'T UNDERSTAND. WHAT'S  
12 SCIENTOLOGY? I WALKED OUT THE DOOR.

13 Q. AND WHEN --

14 A. I LEFT THE PREMISES.

15 Q. WHEN IN 1981 IS THAT?

16 A. DECEMBER 12.

17 Q. OKAY. NOW, DURING 1978 WERE YOU  
18 PHYSICALLY WORKING IN CALIFORNIA IN THE VARIOUS  
19 POSITIONS THAT YOU DETAILED FOR US?

20 A. YES.

21 Q. AND IN 1979 WERE YOU PHYSICALLY  
22 WORKING IN CALIFORNIA?

23 A. YEAH.

24 Q. AND IN 1980 WERE YOU PHYSICALLY  
25 WORKING IN CALIFORNIA?

26 A. YEAH. I TRAVELED AROUND, BUT THAT'S  
27 IT.

28 Q. HOW FREQUENTLY DURING 1979 DID YOU



1 COMMUNICATE WITH L. RON HUBBARD?

2 A. QUITE FREQUENTLY.

3 Q. DID YOU COMMUNICATE WITH HIM ON A  
4 DAY-TO-DAY BASIS?

5 A. PERHAPS NOT DAY-TO-DAY BUT I HAD  
6 ONGOING COMMUNICATIONS WHICH WOULD GO ON ON A REGULAR  
7 BASIS BACK AND FORTH.

8 Q. HOW FREQUENTLY DURING 1979 DID YOU SEE  
9 HUBBARD?

10 A. INFREQUENTLY.

11 Q. COULD YOU TELL US APPROXIMATELY ON HOW  
12 MANY OCCASIONS IN 1979 YOU SAW HUBBARD?

13 A. SIX. SIX OR EIGHT.

14 Q. DO YOU RECALL WHEN ANY OF THOSE  
15 OCCASIONS OCCURRED DURING THE LATTER PART OF 1979,  
16 SEPTEMBER THROUGH DECEMBER?

17 A. I DON'T RECALL THE DATES EXACTLY,  
18 ALTHOUGH I DO RECALL IT BEING IN THE FALL OF '79  
19 BEING THE LAST TIME THAT I SAW HIM.

20 Q. DO YOU RECALL WHETHER IN THE FALL WAS  
21 THE LAST TIME YOU SAW HIM?

22 A. NOT THE DATE, NO.

23 Q. AND ON HOW MANY OCCASIONS DID YOU  
24 SPEAK DIRECTLY TO HUBBARD DURING 1979?

25 A. A COUPLE.

26 Q. SO, WHEN YOU SAY THAT YOU HAD ONGOING  
27 COMMUNICATIONS WITH HUBBARD WERE THOSE WRITTEN  
28 COMMUNICATIONS?

1 A. YEAH.

2 Q. WHAT FORM DID THOSE WRITTEN  
3 COMMUNICATIONS TAKE?

4 A. MAINLY TYPED.

5 Q. WERE THEY LETTERS TO YOU?

6 A. BOTH WAYS. THEY WEREN'T -- I DON'T  
7 KNOW WHAT YOU MEAN BY "LETTERS." THEY HAD TO DO WITH --  
8 I WAS IN CHARGE OF HIS HOUSE AND HIS OFFICES AT  
9 GILMAN HOT SPRINGS AND HE HAD A LOT OF THINGS WHICH  
10 HE ORDERED DONE AND I WAS RESPONSIBLE FOR CARRYING  
11 THEM OUT AND I COMMUNICATED WITH HIM BACK AND FORTH  
12 AS TO SPECIFICS AND AS TO WHAT EXACTLY HE WANTED AND  
13 WHEN THEY WERE DONE.

14 Q. AND PHYSICALLY THESE COMMUNICATIONS  
15 TOOK THE FORM OF MEMOS OR LETTERS, SOMETHING LIKE  
16 THAT --

17 A. YES.

18 Q. -- TO HUBBARD, FROM HUBBARD TO YOU?

19 A. YES.

20 Q. DID YOU ALSO SEE DURING 1979  
21 COMMUNICATIONS MADE BY HUBBARD TO OTHERS IN THE  
22 CHURCH OF SCIENTOLOGY?

23 A. YEAH.

24 Q. DID YOU SEE THOSE COMMUNICATIONS ON A  
25 REGULAR BASIS?

26 A. YEAH. YOU KNOW, I WOULD HAVE SEEN AT  
27 THAT TIME THOSE COMMUNICATIONS WHICH WERE, YOU KNOW,  
28 PRETTY WELL RELEVANT TO GILMAN HOT SPRINGS TYPE ITEMS.



1 BUT I SAW SOME MANAGEMENT MATERIALS. BUT GENERALLY  
2 NOT.

3 Q. WHEN YOU --

4 A. HERE, YOU KNOW, I SAW SOME OF THE  
5 COMMUNICATIONS FROM HUBBARD. THERE'S NO WAY I COULD  
6 HAVE SEEN THEM ALL. I WAS NOT IN A POSITION TO SEE  
7 THEM ALL. SO I'M NOT AS TO, YOU KNOW, BEING AN  
8 AUTHORITY ON ALL OF HIS COMMUNICATIONS AT THAT TIME,  
9 NO. BUT I KNOW THAT I WAS NOT THE ONLY ONE THAT HE  
10 WAS COMMUNICATING TO. THAT WAS IF THAT WAS THE  
11 INTENT OF YOUR QUESTION.

12 Q. YOU MADE REFERENCE TO GILMAN HOT  
13 SPRINGS. WAS THAT THE PHYSICAL LOCATION WHERE YOU  
14 WORKED DURING 1979?

15 A. YES.

16 Q. AT ANY POINT DURING 1979 DID YOU AND  
17 HUBBARD HAVE ANY OCCASION TO DISCUSS MICHAEL FLYNN?

18 A. WELL, WE SHOULD HAVE, BUT --

19 Q. LISTEN TO THE QUESTION.

20 YES OR NO? YOU DID NOT?

21 A. RIGHT. YOU MEAN DID WE DISCUSS HIM OR  
22 DID WE HAVE AN OCCASION TO? NO, WE DIDN'T DISCUSS  
23 HIM.

24 Q. DID YOU AND HUBBARD EXCHANGE ANY  
25 WRITTEN COMMUNICATIONS CONCERNING MICHAEL FLYNN IN  
26 1979?

27 A. NO.

28 Q. DID YOU SEE ANY WRITTEN COMMUNICATIONS

1 FROM HUBBARD TO ANYONE IN 1979 ON THE SUBJECTS OF MR.  
2 FLYNN?

3 A. NO.

4 Q. DID YOU SEE ANY COMMUNICATIONS OF ANY  
5 KIND TO HUBBARD FROM ANYONE IN 1979 ON THE SUBJECT OF  
6 MR. FLYNN?

7 A. I DON'T THINK SO.

8 Q. WERE YOU AWARE IN 1979 THAT THERE WERE  
9 ANY DISPUTES BETWEEN MR. FLYNN AND SCIENTOLOGY?

10 A. NO.

11 Q. DID YOU EVER HEAR MR. FLYNN'S NAME IN  
12 1979?

13 A. WELL, I MAY HAVE, BUT IT DOESN'T  
14 REGISTER. I DID -- DEFINITELY DID IN '80 BUT NOT '79.

15 Q. WHEN IS THE FIRST TIME YOU RECALL  
16 HEARING MR. FLYNN'S NAME IN 1980?

17 A. I THINK IT WAS RIGHT IN THE BEGINNING  
18 OF 1980 WHEN I WAS INVOLVED IN THE MCCS MISSION.

19 Q. AT ANY TIME IN 1979 DID YOU  
20 PARTICIPATE IN ANY CONVERSATION WITH ANYONE IN  
21 SCIENTOLOGY REGARDING MICHAEL FLYNN?

22 A. NO.

23 Q. AT ANY TIME IN 1979 DID YOU DISCUSS  
24 WITH ANYONE IN SCIENTOLOGY PLACING WATER IN THE FUEL  
25 SYSTEM OF AN AIRPLANE OWNED BY MR. FLYNN?

26 A. NO.

27 Q. AT ANY TIME DID YOU EVER PARTICIPATE  
28 IN A CONVERSATION WITH ANYONE IN SCIENTOLOGY ON THE



1       SUBJECTS OF PLACING WATER OR ANY FOREIGN SUBSTANCE IN  
2       THE FUEL TANKS OF MR. FLYNN'S AIRPLANE?

3               A.           NO.

4               Q.           DID ANYONE EVER TELL YOU THAT THEY HAD  
5       PLACED WATER OR ANY OTHER SUBSTANCE IN THE FUEL TANKS  
6       OF MR. FLYNN'S AIRPLANE?

7               A.           NO.

8               Q.           DID YOU EVER SEE ANY DOCUMENTS WHICH  
9       INDICATED THAT ANYONE CONNECTED WITH SCIENTOLOGY HAD  
10      PLACED WATER OR ANY OTHER SUBSTANCE IN THE FUEL TANKS  
11      OF MR. FLYNN'S AIRPLANE?

12              A.           NO.

13              Q.           DID ANYONE EVER TELL YOU THAT THEY HAD  
14      PLANNED AN ACTION TO SABOTAGE MR. FLYNN'S AIRPLANE?

15              A.           NO.

16              Q.           DID YOU EVER SEE ANY DOCUMENTS  
17      AUTHORED BY OR FOR ANYONE AT SCIENTOLOGY WHICH  
18      DISCUSSED PLANNING THE SABOTAGE OF MR. FLYNN'S  
19      AIRPLANE?

20              A.           NO.

21              Q.           DID YOU EVER SEE ANY DOCUMENTS  
22      PREPARED BY OR FOR ANYONE AFFILIATED WITH SCIENTOLOGY  
23      WHICH DISCUSSED MR. FLYNN'S AIRPLANE?

24              MR. MARTINEZ:   CAN I HAVE THE QUESTION BACK.

25                              (RECORD READ)

26              THE WITNESS:   THE ONLY THING THAT COMES TO  
27      MIND, THERE ARE -- AND I DON'T KNOW IF THIS IS THE  
28      SAME PLANE BECAUSE THE PICTURE I GOT OF IT IS PRETTY

1 FUZZY, BUT THE PICTURE WAS FUZZY IN ITSELF BUT THEY  
2 TOOK A PHOTO. THEY WERE APPARENTLY HAVING HIM  
3 SURVEILLED AND THEY TOOK A PHOTO OF FLYNN NEXT TO A  
4 PLANE. AND THEY PUBLISHED IT AND THERE WAS SOME  
5 PIECE THEY BROUGHT OUT. SOME, I DON'T KNOW WHAT IT  
6 WAS, SOME ATTEMPT TO FRAME HIM OR SOMETHING LIKE THAT.  
7 AND THERE'S A PICTURE OF A PLANE. MIKE FLYNN AND A  
8 PLANE IN IT. SO THAT'S --

9 BY MS. O'MELVENY:

10 Q. WHEN YOU SAY THEY TOOK A PHOTO OF  
11 MR. FLYNN, DO YOU KNOW WHO --

12 A. WELL, SOMEBODY TOOK A PHOTO OF HIM.

13 Q. DO YOU KNOW WHO TOOK A PHOTOGRAPH OF  
14 MR. FLYNN?

15 A. NO. THE SOURCE OF THE PHOTOS WAS NOT  
16 NOTED IN THE ARTICLE.

17 Q. WHEN DID YOU SEE THIS ARTICLE?

18 A. GOD, IT WAS JUST A FEW MONTHS BACK, I  
19 DON'T RECALL THE DATE EXACTLY. IT WAS A SERIES THAT  
20 THEY BROUGHT OUT. SOME ATTEMPT TO IMPLICATE MIKE  
21 FLYNN IN A BAD CHECK DEAL. SOME OPERATION AGAINST  
22 MICHAEL FLYNN AND I REALLY DON'T KNOW IF IT'S THE  
23 SAME PLANE. THE PICTURE I GET -- YOU KNOW, THE  
24 PHOTOS WERE KIND OF MADE SORT OF DELIBERATLY FUZZY TO  
25 MAKE THEM LOOK KIND OF LIKE A MOBSTER. THAT WAS THE --  
26 AND IT SEEMS TO ME IT WAS A BIGGER PLANE BECAUSE I  
27 GET THE PICTURE OF HIM TURNED AROUND ON THE STEPS OF  
28 A PLANE. IT PROBABLY IS NOT THE SAME PLANE, BUT, YOU



1 KNOW, IT INDICATES THAT SOMEONE HAD AN INTEREST IN  
2 MIKE FLYNN AND PLANES. BUT --

3 Q. IS THIS THE FIRST TIME YOU EVER SAW A  
4 PHOTOGRAPH OF MR. FLYNN'S AIRPLANE?

5 A. WELL, THAT'S YOUR STATEMENT THAT IT'S  
6 MR. FLYNN'S AIRPLANE. I DON'T KNOW THAT IT IS.

7 Q. IS THIS THE FIRST TIME YOU EVER SAW A  
8 PHOTOGRAPH OF MR. FLYNN NEXT TO AN AIRPLANE?

9 A. YEP.

10 Q. AND WHEN YOU SAY THEY APPARENTLY HAD  
11 MR. FLYNN UNDER SURVEILLANCE, WHO IS THE "THEY" THAT  
12 YOU ARE REFERRING TO?

13 A. WELL, YOU KNOW, WHOEVER -- AGAIN, YOU  
14 HAVE TO UNDERSTAND THAT IT ALL COMES DOWN TO L. RON  
15 HUBBARD. THE WHOLE THING IS OPERATED AND RUN BY L.  
16 RON HUBBARD SO WHOEVER -- THEY ARE -- WERE ULTIMATELY  
17 WERE EMPLOYED BY L. RON HUBBARD. WHETHER OR NOT THEY  
18 WERE A BUNCH OF P.I.'S; WHETHER OR NOT THEY WERE  
19 HITMEN; WHETHER OR NOT THEY WERE LOCAL SCIENTOLOGY  
20 GROUPS, WHO KNOWS. I DON'T RECALL AND I DON'T  
21 BELIEVE THAT THE PHOTO WAS -- INDICATED WHO HAD TAKEN  
22 THE PHOTOS. BUT IT CERTAINLY WAS, YOU KNOW, SOMEONE  
23 HAD PHOTOGRAPHED HIM ON THE PLANE AND PLUGGED IT INTO  
24 THIS ARTICLE IN WHICH HE WAS ACCUSED OF CRIMINAL  
25 ACTIVITIES. MAFIA CONNECTIONS, I THINK IT WAS.

26 Q. OKAY. BUT YOU ARE REFERENCINNG "HIM"--  
27 TO HAVING HIM UNDER SURVEILLANCE OR "THEY" TOOK THE  
28 PHOTOGRAPHS RELATES TO THIS ARTICLE THAT YOU SAW?



1 A. WELL, THE SURVEILLANCE RELATES TO --  
2 IT RELATES TO PRACTICE OPERATIONS AGAINST MICHAEL  
3 FLYNN. I MEAN, IT IS WIDELY --

"or clandestine"

4 Q. DO YOU HAVE ANY PERSONAL KNOWLEDGE OF  
5 ANY SURVEILLANCE UNDERTAKEN OF MR. FLYNN AND/OR HIS  
6 PLANE?

7 A. THE ONLY -- I WAS NEVER INVOLVED IN  
8 ANY OPERATIONS MYSELF. I SAW ONLY ONE COMMUNICATION  
9 AND THIS WAS SOMETIME IN LATE 1981 AND IT WAS A TELEX  
10 AND IT WAS FROM NORMAN STARKEY TO TERRI GAMBOA.  
11 TERRI AT THAT TIME UNDER DAVID MISCAVAGE WAS  
12 OPERATING THE VARIOUS LEGAL MISSIONS. SHE WAS ONE OF  
13 HUBBARD'S MESSENGERS AND SHE AND NORMAN WERE IN  
14 CHARGE OF WHAT WAS CALLED AT THAT TIME THE SPECIAL  
15 PROJECT WHICH LATER DEGENERATED INTO AUTHOR SERVICES  
16 INCORPORATED AND R.T.C. AND THERE WAS A  
17 COMMUNICATION FROM NORMAN STARKEY TO TELEX AND IT WAS  
18 HE WAS AT THAT TIME IN BOSTON WITH JOE LISA AND THEY  
19 WERE SURVEILLING MICHAEL FLYNN'S OFFICE. NOW, --

20 Q. "THEY" BEING MR. STARKEY AND MR. LISA?

21 A. RIGHT. THAT WAS THE GIST OF THE TELEX.  
22 AND I HAD AN OCCASION TO BE IN TERRI'S OFFICE WHICH  
23 WAS AT THAT TIME ON THE TOP OF THE C.M.O. BUILDING IN  
24 LOS ANGELES AND THAT'S WHERE I SAW THE COMMUNICATION.

25 Q. OKAY. AND TO THE BEST OF YOUR  
26 RECOLLECTION, THE COMMUNICATION SAID WHAT?

27 A. THAT'S BASICALLY WHAT -- IT INDICATED  
28 THAT, IN THIS PARTICULAR TIME, IT WAS LATE AT NIGHT.



1 FLYNN WAS IN HIS OFFICE WORKING. AND HE WAS WITH --  
2 AND THAT NORMAN WAS WITH JOE LISA AND THEY WERE  
3 OBSERVING MIKE FLYNN IN HIS OFFICE LATE AT NIGHT  
4 WORKING.

5 Q. DO YOU RECALL WHEN IN 1981 THIS TELEX  
6 WAS SENT?

7 A. IT WOULD HAVE BEEN IN THE LATTER PART,  
8 CERTAINLY, OF 1981. IT WOULD HAVE BEEN -- I HAD  
9 OCCASION TO SEE TERRI PROBABLY NOVEMBER, MAYBE  
10 OCTOBER, BUT IN ANY CASE, AROUND THAT TIME.

11 Q. HAVE YOU EVER SEEN THAT TELEX SINCE?

12 A. NO.

13 Q. AND THAT IS THE ONLY DOCUMENT THAT YOU  
14 EVER SAW THAT PERTAINED TO --

15 A. SURVEILLANCE OF MICHAEL FLYNN?

16 Q. YES.

17 A. BOY, I DON'T KNOW IF THERE IS ANYTHING  
18 SUBSEQUENTLY OR NOT.

19 Q. WHILE YOU WERE WORKING IN SCIENTOLOGY,  
20 THAT'S THE ONLY DOCUMENT YOU EVER SAW?

21 A. THAT'S ALL I RECALL RIGHT NOW. YOU  
22 KNOW, I KNEW BY THAT TIME THAT MICHAEL FLYNN WAS, YOU  
23 KNOW, THEIR TOP ENEMY. THAT WAS WELL ESTABLISHED SO  
24 I KNEW IN THE COMMUNICATION WHO THE VARIOUS PARTIES  
25 WERE.

26 Q. NOW, YOU SAY --

27 A. THAT'S THE ONLY THING THAT I KNOW OF  
28 AT THIS TIME, ANYWAY.

1 Q. YOU DID NOT MAKE A COPY OF THAT TELEX;  
2 IS THAT CORRECT?

3 A. NO, UNFORTUNATLY, NO.

4 Q. YOU SAY THAT THE TELEX WAS SENT TO  
5 TERRI GAMBOA; IS THAT CORRECT?

6 A. WELL, I BELIEVE SO. YOU KNOW, I KNOW  
7 THAT THE TELEX CAME FROM NORMAN STARKEY. I KNOW THAT  
8 HE WAS THERE WITH JOE LISA. I KNOW -- YOU KNOW, I  
9 TALKED TO TERRI FOR SOME TIME. IT WAS ON HER DESK.  
10 IT WAS A MATTER THAT SHE WAS DEALING WITH. WHETHER  
11 OR NOT SHE WAS ON THE ROUTING, I DON'T KNOW. BUT IT  
12 MAKES SENSE -- YOU KNOW, I CAN'T -- YOU KNOW THE WAY  
13 SCIENTOLOGY HAD THEIR ROUTING, YOU KNOW, THERE'S A  
14 TELEX DESIGNATION. THERE'S A BUNCH OF NUMBERS AND  
15 THEN SOME LETTERS AND RIGHT NOW IT JUST IS FUZZY  
16 OTHER THAN THE VARIOUS PLAYERS THAT I MENTIONED.

17 Q. OKAY. SO YOU HAVE NO OTHER  
18 RECOLLECTION OF WHO WAS ON -- DESIGNATED AS SOMEONE  
19 WHO HAD RECEIVED THE TELEX?

20 A. PEOPLE WHO WOULD HAVE RECEIVED IT  
21 WOULD HAVE BEEN TERRI AND DAVID MISCAVAGE.

22 Q. WHO DO YOU RECALL SEEING ON THE TELEX?

23 A. SOME OP'S OF SOME KIND. NO, I DON'T  
24 RECALL THE DESIGNATION WHO WOULD BE THE -- WHAT THE  
25 INITIALS WOULD HAVE BEEN.

26 Q. OKAY. OTHER THAN SEEING THIS ARTICLE  
27 A FEW MONTHS BACK WHICH CONTAINED A PHOTOGRAPH OF MR.  
28 FLYNN STANDING NEXT TO AN AIRPLANE, HAVE YOU SEEN ANY



1 DOCUMENTS AUTHORED BY OR FOR ANYONE IN SCIENTOLOGY  
2 WHICH DISCUSS MR. FLYNN'S AIRPLANE?

3 A. NO.

4 Q. HAVE YOU SEEN ANY DOCUMENTS WHICH  
5 CONTAIN A PHOTOGRAPH OF MR. FLYNN'S AIRPLANE?

6 A. NO.

7 Q. AND YOU NEVER PREPARED ANY DOCUMENTS  
8 DURING THE TIME THAT YOU WERE AFFILIATED WITH  
9 SCIENTOLOGY PERTAINING TO MR. FLYNN'S AIRPLANE; IS  
10 THAT CORRECT?

11 A. NO.

12 Q. HAVE YOU EVER HEARD FROM ANYONE OTHER  
13 THAN MR. FLYNN THAT IN OCTOBER OF 1979 MR. FLYNN  
14 EXPERIENCED DIFFICULTIES WITH HIS AIRPLANE DUE TO THE  
15 CLAIMED PRESENCE OF WATER IN THE FUEL SYSTEM?

16 A. I THINK YOU'RE THE FIRST PERSON. I  
17 DON'T THINK ANYONE ELSE HAS EVER DISCUSSED IT.

18 Q. HAVE YOU EVER DISCUSSED THAT SUBJECT  
19 WITH MR. FLYNN?

20 A. I DON'T RECALL IF I DID OR I DIDN'T.

21 Q. HAVE YOU EVER HEARD PRIOR TO TODAY  
22 THAT MR. FLYNN CLAIMED THAT THE CHURCH OF SCIENTOLOGY  
23 OF CALIFORNIA HAD PLACED OR CAUSED TO BE PLACED WATER  
24 IN THE FUEL TANKS OF HIS AIRPLANE?

25 A. I DON'T THINK -- YOU KNOW, IN ALL  
26 COMMUNICATIONS, I DON'T THINK HE'S EVER SAID THAT.  
27 HE MAY -- YOU KNOW, HE MAY HAVE ASKED ME ABOUT IT.  
28 YOU KNOW, ABOUT THE POSSIBILITY OF IT, BUT THAT'S --



1 YOU GET INTO OUR PARTICULAR COMMUNICATIONS. BUT IN  
2 ANYTHING THAT I'VE EVER HEARD IT WAS -- YOU KNOW, IT  
3 WAS KIND OF CIRCUMSTANTIAL THE WAY IT WAS STATED.  
4 YOU KNOW, LIKE I HAVE SIMILAR SITUATIONS IN MY LIFE  
5 WHERE THE CIRCUMSTANTIAL EVIDENCE IS FAIRLY HEAVY BUT  
6 AS FAR AS MAKING AN ALLEGATION OR BRINGING A CHARGE,  
7 YOU KNOW, IT WOULD BE VIRTUALLY IMPOSSIBLE. IT'S AN  
8 INTELLIGENCE OPERATION, AFTER ALL.

9 Q. DO YOU RECALL MR. FLYNN EVER ASKING  
10 YOU IF YOU KNEW ANYTHING ABOUT AN EFFORT TO SABOTAGE  
11 HIS AIRPLANE?

12 A. I DON'T THINK SO. YOU KNOW, HE MAY  
13 HAVE. YOU KNOW, I'VE TALKED TO THE GUY FOR THOUSANDS  
14 OF HOURS SO SOMEWHERE ALONG THE LINE I DID LEARN OF  
15 THIS INCIDENT AND -- BUT I COULDN'T EVEN, YOU KNOW --  
16 I WAS NEVER INVOLVED SO IT JUST WASN'T A BIG DEAL  
17 OTHER THAN THE FACT IT'S GOD DAMN SCARY.

18 Q. NOW, WHEN YOU SAY SOMEWHERE ALONG THE  
19 LINE YOU LEARNED OF THE INCIDENT, WHAT IS YOUR BEST  
20 RECOLLECTION OF WHAT YOU LEARNED ABOUT THIS MATTER?

21 MR. MARTINEZ: DO YOU UNDERSTAND THE QUESTION?

22 THE WITNESS: I THINK SO.

23 MS. O'MELVENY: WOULD YOU READ BACK THE  
24 WITNESS' LAST ANSWER.

25 (RECORD READ)

26 BY MS. O'MELVENY:

27 Q. YOU TESTIFIED THAT SOMEWHERE ALONG THE  
28 LINE YOU DID LEARN OF THIS INCIDENT, AND WHAT I'M



1 ASKING YOU TO TELL US WHEN YOU FIRST LEARNED OF IT  
2 AND WHAT YOU LEARNED -- WHAT YOU WERE TOLD?

3 A. AND I ASKED YOU DID --

4 Q. I'M JUST ASKING YOU TO EXPLAIN TO US  
5 YOUR STATEMENT THAT SOMEWHERE ALONG THE LINE YOU  
6 LEARNED OF THIS INCIDENT BY TELLING US WHAT YOU  
7 REMEMBER HEARING AND WHEN?

8 A. I THINK THAT, YOU KNOW, IT'S COME UP A  
9 NUMBER OF TIMES. BUT BOY, I COULDN'T EVEN TELL YOU  
10 THE ROUTE HE TOOK; I COULDN'T TELL YOU -- I KNOW  
11 SOMETHING ABOUT A DESCRIPTION OF THE ENGINE CATCHING  
12 AGAIN AND HIM MAKING IT AND A GUY IN THE BACK WHO --  
13 HIS SON WAS IN THE PLANE. THERE WAS SOMEBODY ELSE  
14 WHO WAS IN THE PLANE AND THE GUY WAS FREAKING OUT OR --  
15 YOU KNOW -- AND HIM RUNNING THROUGH VARIOUS THINGS  
16 THAT YOU'RE SUPPOSED TO DO DURING THIS INCIDENT.

17 Q. LET ME ASK YOU: YOU SAY IT'S COME UP  
18 A NUMBER OF TIMES. AM I CORRECT IN UNDERSTANDING  
19 IT'S COME UP A NUMBER OF TIMES IN DISCUSSIONS THAT  
20 YOU AND MR. FLYNN HAD?

21 A. YEAH.

22 Q. OKAY.

23 A. NOT A LOT, YOU KNOW. YOU KNOW,  
24 THROUGH TIME I KIND OF GATHERED MORE OF THE SCENE.

25 Q. OKAY.

26 A. BUT I COULD NEVER TELL YOU --

27 Q. LET ME ASK YOU THIS: OTHER THAN  
28 HEARING MR. FLYNN DESCRIBE THE INCIDENT ON HOWEVER

1 MANY OCCASIONS THAT MAY HAVE BEEN, HAVE YOU EVER  
2 HEARD ANYONE ELSE DISCUSS THIS MATTER?

3 A. ANOTHER PERSON?

4 Q. YES. OTHER THAN MR. FLYNN?

5 A. BOY, I DON'T THINK SO.

6 Q. OKAY.

7 A. AND, YOU KNOW, REGARDING FLYNN, TOO,  
8 MY UNDERSTANDING IS THIS HAS SOMETHING TO DO WITH  
9 SOME TALK HE GAVE. AND MAYBE THE TALK AT THE -- YOU  
10 KNOW, THAT I ATTENDED IN WHICH CASE IT MAY HAVE BEEN  
11 SAID THERE AS WELL PUBLICLY. SOMETHING ABOUT SOME  
12 PLANE. I DON'T EVEN KNOW IF THAT'S IT. BUT I DID  
13 ATTEND A SPEECH. THAT PART OF IT DOESN'T EVEN  
14 REGISTER AS A BIG DEAL. BUT I MAY HAVE BEEN PRESENT  
15 IF THAT'S THE SAME SPEECH WHICH IS THE SUBJECT OF  
16 THIS LAWSUIT.

17 Q. BUT YOUR RECOLLECTION IS THAT YOU HAVE  
18 HEARD MR. FLYNN DISCUSS THIS INCIDENT IN PUBLIC, THE  
19 MATTER OF HIS AIRPLANE HAVING DIFFICULTY?

20 A. WELL, AGAIN, --

21 MR. MARTINEZ: IT MISSTATES HIS TESTIMONY.

22 THE WITNESS: RIGHT. IF -- HERE'S THE THING.  
23 IF WE'RE TALKING ABOUT THAT -- THE SPEECH HE GAVE --  
24 BY MS. O'MELVENY:

25 Q. ALL I'M ASKING YOU --

26 A. WELL, I DON'T WANT TO GIVE YOU "NO"  
27 IF IT'S INDEED TRUE. BECAUSE I DON'T HAVE A STRONG  
28 RECOLLECTION. BUT I DID ATTEND THAT TALK. SO I



1 THINK THAT --

2 Q. AND AT THAT TALK --

3 A. YOU KNOW, <sup>HEDGE</sup> HEAD ROWS ARE <sup>ALMOST</sup> ALSO HITTING  
4 THE VARIOUS PARTIES. THE SON INVOLVED AND THE OTHER  
5 GUY WHOSE NAME I DON'T RECALL, I NEVER LEARNED THOSE  
6 THINGS DURING A SPEECH.

7 Q. BUT YOU DID LEARN THOSE THING AT SOME  
8 POINT FROM A CONVERSATION WITH MR. FLYNN?

9 A. YEAH. WHO WAS PRESENT, WHERE IT WAS,  
10 I COULD NEVER PINPOINT IT.

11 Q. DO YOU RECALL EVER READING ANY ACCOUNT  
12 OF THIS INCIDENT AS DESCRIBED BY MR. FLYNN?

13 A. DON'T KNOW. MAY HAVE. YOU KNOW, I  
14 MAY HAVE EVEN -- I DON'T KNOW. VARIOUS PEOPLE MAY  
15 HAVE ASKED ME ABOUT IT. YOU KNOW, WHAT WAS MY  
16 OPINION OR --

17 Q. DO YOU HAVE A RECOLLECTION OF PEOPLE  
18 ASKING YOU FOR YOUR OPINION ON THIS MATTER?

19 A. IT ISN'T A BIG -- IT ISN'T A BIG DEAL  
20 BECAUSE, YOU KNOW, PEOPLE ASK MY OPINION ABOUT  
21 MILLIONS OF THINGS. BUT, YOU KNOW, AND ALL I WOULD  
22 GIVE IS MY OPINION. I -- YOU KNOW, YOU'VE ASKED ME  
23 ALL THE QUESTIONS. I DON'T HAVE ANY SPECIFIC  
24 KNOWLEDGE OF IT AND THAT'S WHAT I WOULD SAY. I DON'T  
25 HAVE ANY SPECIFIC KNOWLEDGE. DO I THINK THAT THE  
26 ORGANIZATION IS CAPABLE OF IT OR IS IT PURSUANT TO  
27 THEIR MODE OF OPERATION, YOU BET.

28 Q. DID YOU TELL MR. FLYNN THAT YOU HAD NO



1 SPECIFIC KNOWLEDGE OF THIS MATTER?

2 A. WHAT I SAID TO MR. FLYNN IS -- HAS  
3 NOTHING WHATSOEVER TO DO WITH THIS PARTICULAR THING.  
4 WHAT -- YOU KNOW, I DON'T WANT TO WAIVE THE PRIVILEGE  
5 IN ANSWERING A STUPID QUESTION LIKE THAT.

6 Q. LET ME MAKE IT VERY PLAIN THAT IN  
7 ASKING YOU YOUR ANSWER TO THAT QUESTION I CAN  
8 REPRESENT THAT NO ARGUMENT WILL BE MADE THAT YOU HAVE  
9 WAIVED THE PRIVILEGE IN ANY OTHER AREA ON ANY OTHER  
10 SUBJECT OR EVEN ON THIS SUBJECT AS TO WHATEVER MAY BE  
11 INVOLVED IN SOME OTHER LITIGATION.

12 A. WELL, OKAY. IN THAT CASE, THEN, I  
13 WOULD HAVE GIVEN MR. FLYNN THE SAME ANSWER I WOULD  
14 GIVE YOU. AND THE ANSWER WOULD BE NO, I DON'T HAVE  
15 ANY SPECIFICS ABOUT IT. I DO -- I DO KNOW THAT, YES,  
16 THE ORGANIZATION IS CAPABLE OF IT; YES, THE  
17 ORGANIZATION IS SUPREMELY COMPARTMENTALIZED; YES,  
18 THEY SEEK HIS DESTRUCTION; YES, THEY SEEK MY  
19 DESTRUCTION; YES, SIR, THEY ARE RUTHLESS; YES, THAT'S  
20 POLICY. BUT WHETHER OR NOT IT WAS THEM, I CAN'T SAY.

21 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
22 HAD ANY EVIDENCE TO INDICATE THAT THE CHURCH OF  
23 SCIENTOLOGY HAD IN FACT PLACED WATER IN THE FUEL  
24 TANKS OF HIS AIRPLANE?

25 A. AGAIN, WHATEVER MR. FLYNN SAID TO ME I  
26 THINK IS COMPLETELY COVERED BY --

27 Q. I WILL MAKE THE SAME REPRESENTATION TO  
28 YOU. I AM JUST TRYING TO GET VERY LIMITED ANSWERS TO



1 QUESTIONS THAT ARE IN ISSUE IN THIS LAWSUIT AND NO  
2 PRIVILEGE WILL BE WAIVED IN ANY SUIT OR THIS SUIT.

3 MR. MARTINEZ: IF YOU WOULD LIKE TO CONSULT  
4 WITH MR. FLYNN AS TO WHETHER THAT IS IN  
5 ATTORNEY/CLIENT CONFIDENCE FEEL FREE TO DO SO.

6 THE WITNESS: OKAY. HE'S MY ATTORNEY AND I  
7 THINK THAT IN THAT HE IS ALSO THE DEFENDANT IN THE  
8 ACTION, I SHOULD --

9 BY MS. O'MELVENY:

10 Q. LET ME JUST INDICATE TO YOU, I REALIZE  
11 HE'S YOUR ATTORNEY IN MANY MATTERS BUT HE IS NOT YOUR  
12 ATTORNEY WITH RESPECT TO YOUR APPEARANCE HERE TODAY;  
13 IS THAT CORRECT.

14 MR. MARTINEZ: WELL, HE'S NOT REPRESENTED BY  
15 AN ATTORNEY, THAT'S TRUE.

16 MS. O'MELVENY: LET ME JUST SAY THAT IT WAS MY  
17 UNDERSTANDING THAT YOUR ATTORNEY WAS MS. DRAGOJEVIC;  
18 IS THAT INCORRECT?

19 THE WITNESS: WELL, I HAVE A LOT OF ATTORNEYS.  
20 BUT MIKE FLYNN IS MY ATTORNEY.

21 BY MS. O'MELVENY:

22 Q. OKAY. IN ANY EVENT, IF YOU WANT TO  
23 CONSULT WITH HIM --

24 A. HE IS THE DEFENDANT IN THE CASE.  
25 WHETHER OR NOT HE CAN ALSO REPRESENT ME AT A  
26 DEPOSITION --

27 MR. MARTINEZ: THE QUESTION IS IF YOU MADE A  
28 STATEMENT TO HIM OR HE MADE A STATEMENT TO YOU IN THE



1 COURSE OF AN ATTORNEY/CLIENT SITUATION IT WOULD BE  
2 PRIVILEGED. AND YOU ARE FREE TO DISCUSS THAT WITH  
3 MR. FLYNN IN TERMS OF WHETHER OR NOT YOU WANT TO  
4 RESPOND TO THE QUESTION OR NOT.

5 THE WITNESS: RIGHT.

6 MR. MARTINEZ: IT DEPENDS ON WHETHER IT WAS A  
7 CONFIDENTIAL COMMUNICATION OR NOT. AND I DON'T KNOW  
8 WHAT IT WAS BUT -- ONLY YOU AND MIKE FLYNN WOULD KNOW.

9 THE WITNESS: LET ME JUST SAY IN MY  
10 RECOLLECTION, EVERYTHING THAT WAS EVER DISCUSSED HAD  
11 TO DO WITH MY RECOLLECTION IS CIRCUMSTANTIAL, BUT, NO  
12 YOU KNOW, THAT IS ALL I COULD OFFER HIM. IS A  
13 PATTERN, THE WAY THEY THINK; THEIR PROPENSITY FOR  
14 GOING AFTER ENEMIES IN THAT MANNER OR SOME OTHER  
15 MANNER; MY OWN PERSONAL EXPERIENCE; MY  
16 UNDERSTANDING OF L. RON HUBBARD'S MENTALITY; THE  
17 FACT THAT THE GUY'S MORE THAN SLIGHTLY DERANGED;  
18 VERY VINDICTIVE; PARANOID. ALL THOSE THINGS ADD UP  
19 TO, YOU KNOW, INDEED A GOOD SHOT THAT IF NOT YOUR  
20 CLIENT THEN SOMEONE ACTING IN CONCERT WITH OR  
21 PURSUANT TO ORDERS OF L. RON HUBBARD COULD INDEED  
22 HAVE DONE SUCH A THING. YOU KNOW, I'VE GONE THROUGH  
23 THAT SORT OF A ROUTINE MYSELF. AND THAT WOULD BE THE  
24 SUBSTANCE OF ANY COMMUNICATIONS FROM ME AND MY  
25 RECOLLECTION IS FROM HIM WITHOUT WAIVING ANY  
26 PRIVILEGE OF ANY KIND.

27 BY MS. O'MELVENY:

28 Q. OKAY. BUT AT THE SAME TIME YOU DID



1 MAKE IT PLAIN TO MR. FLYNN THAT YOU DID NOT HAVE ANY  
2 PERSONAL KNOWLEDGE OF ANY SUCH INCIDENT OR ACTIVITIES;  
3 IS THAT CORRECT.

4 MR. MARTINEZ: YOU MAY WANT TO TALK TO MIKE  
5 FLYNN ABOUT THAT. BY TESTIFYING TODAY YOU WAIVE THAT  
6 PRIVILEGE.

7 THE WITNESS: WHAT DO YOU MEAN?

8 MR. MARTINEZ: IF YOU DISCLOSE A COMMUNICATION.

9 MS. O'MELVENY: HE DOES NOT WAIVE --

10 THE WITNESS: AS FAR AS I KNOW, I'VE DISCLOSED  
11 NO COMMUNICATION. NOTHING OF WHAT MIKE FLYNN DID. IF  
12 I DID, I DIDN'T MEAN TO SO I'M NOT WAIVING ANY  
13 PRIVILEGE.

14 BY MS. O'MELVENY:

15 Q. I WANT TO MAKE IT VERY CLEAR I'M NOT  
16 TRYING TO TRICK YOU.

17 A. I THINK YOU ARE OUT OF LINE ASKING  
18 THOSE QUESTIONS.

19 Q. IT IS THAT ISSUE THAT IS INVOLVED IN  
20 THIS CASE.

21 A. WHAT HAS MIKE FLYNN SAID? WHAT IS IN  
22 ISSUE? YOU GUYS HAVE GONE AFTER HIM FOR WHAT, FOR  
23 SLANDER, DEFAMATION, WHAT IS IT?

24 Q. THIS IS A DEFAMATION ACTION.

25 A. OKAY.

26 Q. SO WHAT IS IN ISSUE IS THE --

27 A. WHETHER OR NOT HE SAID ANYTHING TO ME,  
28 HIS CLIENT?

1 Q. THE ISSUES IN THIS LAWSUIT CONCERN THE  
2 TRUTH OR THE FALSITY OF THIS PARTICULAR STATEMENT AND  
3 THE STATE OF MR. FLYNN'S KNOWLEDGE WITH RESPECT TO  
4 THIS STATEMENT. THAT'S WHY I'M ASKING YOU THE  
5 QUESTIONS I'M ASKING YOU. I'VE TRIED TO MAKE IT VERY  
6 PLAIN THAT I'M NOT ATTEMPTING TO TRAP YOU INTO  
7 WAIVING ANY PRIVILEGE THAT YOU HAVE. I'M TRYING TO  
8 MAKE IT AS CLEAR AS I POSSIBLY CAN THAT NO ONE WILL  
9 USE YOUR ANSWERS TO ARGUE. THAT YOU HAVE WAIVED THE  
10 PRIVILEGE IN ANY OTHER SETTING OF ANY KIND.

11 A. LET ME TELL YOU THAT I DON'T TRUST  
12 YOUR CLIENT AN INCH, A MILIMETER. THEY ARE  
13 COMPLETELY UNSCRUPULOUS. THEY HAVE NO MORALS  
14 WHATSOEVER. AND THEY WILL DO WHAT THEY WANT AND THEY  
15 WILL DUMP YOU IN A SECOND AND WHATEVER REPRESENTATION  
16 YOU MADE; YOU'RE OUT ON A LIMB. SO, THAT'S THE WAY *g*  
17 THEY OPERATE.

18 Q. NOW, LET ME JUST THEN PURSUE THIS SOME  
19 WHAT. MY QUESTION TO YOU WAS: DID MR. FLYNN EVER  
20 ADVISE YOU THAT HE HAD ANY EVIDENCE TO DEMONSTRATE  
21 THAT THE CHURCH OF SCIENTOLOGY OF CALIFORNIA HAD  
22 PLACED WATER OR PLANNED THE PLACING OF WATER OR ANY  
23 OTHER FOREIGN SUBSTANCE IN THE TANKS OF HIS AIRPLANE?

24 MR. MARTINEZ: EXCUSE ME, CAN WE GO OFF THE  
25 RECORD.

26 (BRIEF DISCUSSION HELD OFF THE RECORD)

27 MR. MARTINEZ: WHEN WE WERE ON BREAK WE PHONED  
28 MR. FLYNN AND MR. ARMSTRONG AND MR. FLYNN DISCUSSED



1 THE QUESTION OF THE ATTORNEY/CLIENT PRIVILEGE AND  
2 MR. FLYNN HAS ADVISED MR. ARMSTRONG THAT HE MAY WAIVE  
3 THE PRIVILEGE TO A LIMITED EXTENT OF ALLOWING  
4 MR. ARMSTRONG TO DISCLOSE HIS COMMUNICATIONS WITH  
5 MR. FLYNN RELATIVE TO THE AIRPLANE INCIDENT.

6 YOU MAY ANSWER THE QUESTION.

7 THE WITNESS: OKAY. SO IT IS BASICALLY WHAT I  
8 HAVE SAID ALREADY. AND --

9 BY MS. O'MELVENY:

10 Q. NO. LISTEN TO THE QUESTION. WOULD  
11 YOU READ BACK THE QUESTION.

12 (RECORD READ)

13 THE WITNESS: ABOUT EVIDENCE, RIGHT?

14 MR. MARTINEZ: I THINK HE HEARD THE QUESTION.

15 BY MS. O'MELVENY:

16 Q. THE QUESTION IS: WHAT DID MR. FLYNN  
17 SAY TO YOU?

18 A. RIGHT. AND I'M SAYING IT'S BASICALLY  
19 WHAT I HAVE SAID ALREADY. THERE'S, YOU KNOW, THERE'S  
20 TWO PARTS TO IT. ONE IS THE INCIDENT OCCURRED AND  
21 THERE'S A DESCRIPTION OF THE INCIDENT AND MY  
22 RECOLLECTION HE SAID THAT HE WAS FLYING THE PLANE;  
23 HIS SON WAS IN THE PLANE AND ANOTHER GUY WHO WAS SOME  
24 FRIEND OF HIS WAS IN THE PLANE. HE -- THE ENGINE  
25 QUIT AND SO ON. THOSE DETAILS ARE PROBABLY ALL KNOWN.

26 AND THE OTHER THING IS, THE  
27 CIRCUMSTANTIAL EVIDENCE AS TO THE LIKELIHOOD OF YOUR  
28 CLIENT OR SOMEONE OR SOMEONE ACTING INDEPENDENTLY FOR



1 L. RON HUBBARD OR SOME SCIENTOLOGY FRUITCAKE BECAUSE  
2 SCIENTOLOGY, YOU KNOW, CREATES INDEPENDENTLY CRAZY  
3 INDIVIDUALS WHO WILL ACT INDEPENDENTLY. YOU KNOW,  
4 SPECULATION AS TO THE POSSIBILITY OF ONE OF THOSE  
5 THINGS. IS THE ORGANIZATION CAPABLE OF IT; WHAT IS  
6 THE POSSIBILITY OF IT; COULD IT HAVE BEEN AN  
7 INDEPENDENT PERSON; ARE THEY CAPABLE OF THAT LEVEL OF  
8 CLANDESTINE OPERATIONS; ARE THEY THAT CRAZY; ARE THEY  
9 THAT VINDICTIVE; IS THERE EVIDENCE OF OPERATIONS  
10 AGAINST OTHER PEOPLE OF A SIMILAR NATURE; AND THAT  
11 WAS -- YOU KNOW, IT WAS --

12 Q. THESE ARE SUBJECTS THAT YOU AND  
13 MR. FLYNN DID DISCUSS?

14 A. WELL, AROUND THE PLANE.

15 Q. CORRECT.

16 A. ALL TO DO WITH THE PLANE INCIDENT AND  
17 THE POSSIBILITY AND THE CIRCUMSTANTIAL EVIDENCE.

18 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
19 HAD ANY DIRECT PROOF THAT ANYONE AFFILIATED WITH THE  
20 CHURCH OF SCIENTOLOGY OF CALIFORNIA PLACED WATER IN  
21 THE FUEL TANKS OF HIS PLANE?

22 A. NO, NEVER SAID THAT.

23 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
24 HAD ANY DIRECT PROOF THAT ANYONE AFFILIATED WITH OR  
25 EMPLOYED BY ANY CHURCH OF SCIENTOLOGY BRANCH PLACED  
26 WATER IN THE FUEL TANKS OF HIS AIRPLANE?

27 A. THAT HE HAD DIRECT PROOF, I THOUGHT I  
28 ANSWERED THAT.



1 Q. NO. I ASKED YOU ABOUT THE CHURCH OF  
2 SCIENTOLOGY OF CALIFORNIA AND NOW I'M ASKING YOU  
3 ABOUT ANYONE INVOLVED IN THE CHURCH IN ANY WAY.

4 A. NO.

5 Q. DID MR. FLYNN EVER ASK YOU TO MAKE AN  
6 EFFORT TO DETERMINE WHO MIGHT HAVE PLACED WATER IN  
7 THE FUEL TANK OF HIS AIRPLANE?

8 A. NO.

9 Q. DID YOU EVER TELL MR. FLYNN THAT YOU  
10 BELIEVED ANY PARTICULAR INDIVIDUAL MIGHT HAVE BEEN  
11 INVOLVED IN PLACING WATER OR ANY FOREIGN SUBSTANCE IN  
12 THE FUEL TANKS OF HIS AIRPLANE?

13 A. THE ONLY THING THAT I WOULD HAVE TOLD  
14 HIM IS THAT THAT TYPE OF OPERATION IS -- IT'S  
15 BELIEVABLE AND THE PEOPLE WHO WOULD HAVE BEEN  
16 INVOLVED WOULD HAVE BEEN GUARDIANS OFFICE HIERARCHY  
17 OR PRIVATE INVESTIGATORS OPERATED BY EITHER THE  
18 GUARDIANS OFFICE OR ONE OF L. RON HUBBARD'S MORE  
19 PERSONAL UNITS. SOMEONE UNDER THE DIRECTION OF  
20 HUBBARD.

21 MR. MARTINEZ: OFF THE RECORD.

22 (BRIEF INTERRUPTION)

23 BY MS. O'MELVENY:

24 Q. YOU SAID THAT YOU WOULD HAVE TOLD HIM  
25 THAT OR MIGHT HAVE TOLD HIM THAT. DO YOU HAVE A  
26 SPECIFIC RECOLLECTION OF TELLING HIM THAT ANY OF  
27 THESE ENTITIES OR INDIVIDUALS WOULD HAVE DONE IT OR  
28 COULD HAVE DONE IT?

1           A.           NOT THAT SPECIFIC THING, BUT THOSE ARE  
2 THE INDIVIDUALS WHO WOULD HAVE DONE ANYTHING LIKE  
3 THAT.   EITHER THAT OR SEPARATELY, AS I SAY, A CRAZY  
4 WHO WANTS TO GAIN POINTS AND, YOU KNOW, FOR HIS OWN  
5 SALVATION DESTROY THE ENEMY OF L. RON HUBBARD. SO  
6 THERE'S THOSE THREE POSSIBILITIES. THE ORGANIZATION  
7 IS EXTREMELY COMPARTMENTALIZED.

8           Q.           BUT AS YOU SIT HERE TODAY --

9           A.           DID I EVER SAY -- NO.

10          Q.          -- DO YOU SPECIFICALLY RECALL HAVING  
11 THIS CONVERSATION OR THIS PARTICULAR CONVERSATION  
12 WITH MR. FLYNN?

13          A.          NO.

14          MS. O'MELVENY:   OKAY.   WHY DON'T WE BREAK FOR  
15 LUNCH.

16                       (AT THE HOUR OF 12:25, A LUNCHEON  
17 RECESS WAS TAKEN. THE DEPOSITION TO BE RESUMED AT  
18 1:30)

19                       (AT THE HOUR OF 1:45, THE DEPOSITION  
20 WAS RESUMED OF GERALD DAVID ARMSTRONG, THE SAME  
21 PERSONS BEING PRESENT)  
22 BY MS. O'MELVENY:

23          Q.          MR. ARMSTRONG, YOU ARE STILL UNDER  
24 OATH. ARE YOU AWARE OF THAT?

25          A.          YEAH.

26          Q.          YOU INDICATED THIS MORNING THAT  
27 VARIOUS PEOPLE HAD ASKED YOU FOR YOUR OPINION OR FOR  
28 INFORMATION FROM YOU REGARDING THE AIRPLANE INCIDENT



1 AS CHARGED BY MR. FLYNN. COULD YOU TELL ME THE NAMES  
2 OF ANY OF THOSE PEOPLE?

3 A. NO.

4 Q. IS THAT BECAUSE YOU DON'T KNOW THEIR  
5 NAMES?

6 A. YEAH. I MEAN I'VE TALKED TO JUST  
7 THOUSANDS AND THOUSANDS OF PEOPLE --

8 Q. AND THEY'VE ALL RAISED THIS INCIDENT?

9 A. DON'T BE LUDICROUS.

10 Q. THAT WAS QUESTION.

11 A. SO I CAN'T TELL YOU. THE ONLY THING I  
12 COULD TELL YOU IS THAT IF SOMEONE ASKED ME THAT'S  
13 WHAT I'D TELL THEM. I'D TELL THEM EXACTLY LIKE I'D  
14 TELL YOU. I'VE NEVER INDICATED TO ANYONE THAT --  
15 ANYTHING OTHER THAN THAT.

16 MS. O'MELVENY: I MOVE TO STRIKE THE ANSWER AS  
17 NONRESPONSIVE.

18 MR. MARTINEZ: COULD YOU READ BACK THE  
19 QUESTION, PLEASE.

20 (RECORD READ)

21 BY MS. O'MELVENY:

22 Q. CAN YOU THINK OF ANYONE AS YOU SIT  
23 HERE TODAY WHO HAS SPOKEN TO YOU ABOUT THIS INCIDENT  
24 INVOLVING MR. FLYNN'S AIRPLANE?

25 A. THE ONLY ONE I KNOW FOR CERTAIN IS  
26 MIKE FLYNN. BEYOND THAT, I CAN'T THINK OF ANYONE.

27 Q. AND IN YOUR DISCUSSIONS WITH MR. FLYNN  
28 REGARDING THE AIRPLANE INCIDENT, DID YOU EVER TELL

1 HIM THAT YOU HAD ANY DIRECT PROOF THAT ANYONE  
2 AFFILIATED WITH THE CHURCH OF SCIENTOLOGY OF  
3 CALIFORNIA OR ANY OTHER SCIENTOLOGY ENTITY HAD  
4 PARTICIPATED IN ANY PLAN TO PLACE WATER IN HIS  
5 AIRPLANE FUEL TANKS?

6 A. I'M SURE THAT'S BEEN ASKED AND  
7 ANSWERED BUT IN ANY CASE, NO.

8 Q. DID YOU EVER TELL MR. FLYNN THAT YOU  
9 HAD ANY PERSONAL KNOWLEDGE THAT ANY INDIVIDUAL HAD  
10 DONE SUCH AN ACT?

11 A. NO.

12 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
13 HAD ANY PERSONAL KNOWLEDGE THAT ANY INDIVIDUAL HAD  
14 DONE THIS ACT?

15 A. THAT'S BEEN ASKED AND ANSWERED, TOO.

16 Q. WELL, I WILL JUST POINT OUT TO YOU  
17 THAT WE TOOK A BREAK SO YOU COULD SPEAK TO MR. FLYNN  
18 TO DETERMINE WHETHER YOU WOULD ANSWER QUESTIONS ABOUT  
19 YOUR CONVERSATIONS WITH HIM ON THIS SUBJECT. AND IT  
20 HAS NOT BEEN ASKED AND ANSWERED.

21 A. RIGHT. AND I ALREADY SAID WHAT HAS  
22 BEEN SAID. AND I SAID THERE WAS ONLY THE  
23 CIRCUMSTANTIAL EVIDENCE THAT I LAID OUT.

24 MS. O'MELVENY: WOULD YOU READ BACK THE  
25 QUESTION.

26 MOVE TO STRIKE AS NONRESPONSIVE.

27 THE WITNESS: AND YOU HAVE ASKED ME ABOUT THAT  
28 SPECIFIC QUESTION.



1 BY MS. O'MELVENY:

2 Q. DO YOU NEED THE QUESTION BACK OR CAN  
3 YOU ANSWER THE QUESTION?

4 A. THE ANSWER IS NO.

5 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
6 HAD UNDERTAKEN AN INVESTIGATION TO DETERMINE WHO WAS  
7 RESPONSIBLE FOR PLACING WATER IN HIS FUEL TANKS?

8 A. I DON'T RECALL SUCH A STATEMENT.

9 Q. DID HE EVER TELL YOU THAT ANYONE HAD  
10 COME TO HIM AND TOLD HIM THAT THEY KNEW WHO WAS  
11 RESPONSIBLE FOR PLACING WATER IN HIS AIRPLANE'S FUEL  
12 TANKS?

13 MR. MARTINEZ: READ THE QUESTION BACK.

14 (RECORD READ)

15 MR. MARTINEZ: ASSUMES FACTS NOT IN EVIDENCE.

16 YOU CAN ANSWER.

17 THE WITNESS: NOT THAT I RECALL.

18 BY MS. O'MELVENY:

19 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
20 HAD DETERMINED WHAT CAUSED HIS AIRPLANE TO EXPERIENCE  
21 DIFFICULTIES IN OCTOBER OF 1979?

22 A. MY RECOLLECTION IS WATER.

23 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
24 HAD DETERMINED HOW IT WAS THAT WATER CAUSED HIS  
25 DIFFICULTIES WITH HIS AIRPLANE IN OCTOBER 1979?

26 A. THERE WAS NOTHING -- I DON'T KNOW IF  
27 HE EVER SAID ANYTHING POSITIVE LIKE "THIS IS IT." I  
28 MEAN, WATER I RECALL DEFINITELY. THE POSSIBILITY WAS

1 THAT A BALLOON OR A CAPSULE OR SOMETHING POSSIBLY WAS  
2 PUT INTO THE FUEL TANK.

3 Q. OKAY. THAT POSSIBILITY WAS MENTIONED  
4 TO YOU BY MR. FLYNN?

5 A. YEAH. OR -- I COULDN'T TELL YOU WHERE  
6 OR EVEN HOW -- YOU KNOW, IF I'M NOT -- I RECALL  
7 SOMETHING ABOUT IT AND THEN THINKING MYSELF ALONG  
8 THOSE LINES AND THINKING THAT, WELL, IT WOULD BE --  
9 IT COULD HAVE BEEN POSSIBLE GIVEN THAT THERE IS SOME  
10 SUBSTANCE THAT -- YOU KNOW, THROUGH TIME WOULD ITSELF  
11 DISSOLVE IN GASOLINE OR WHATEVER PLANES BURN, ENGINE  
12 FUEL, AND RELEASE SOME OTHER SUBSTANCE. WHEN I HEARD  
13 IT, I THOUGHT THAT, "THERE'S A REAL POSSIBILITY. IT  
14 SEEMS LIKE THE TYPE OF THING THAT AN INTELLIGENCE  
15 ORIENTED PERSON WOULD KNOW ABOUT. AND COULD HAVE  
16 OCCURRED."

17 Q. OTHER THAN THINKING THAT TO YOURSELF  
18 DID YOU COMMUNICATE THAT TO MR. FLYNN?

19 A. I DON'T RECALL IF I TOLD HIM MY  
20 SPECULATION OR NOT. I JUST, YOU KNOW -- WHEN I HEARD  
21 ABOUT THIS, YOU KNOW, I HAVEN'T THOUGHT ABOUT MIKE  
22 FLYNN OR HIS PLANE FOR A LONG TIME, BUT I THOUGHT  
23 ABOUT IT AGAIN WHEN I HEARD THAT THERE WAS THIS  
24 DEPOSITION GOING ON AND APPARENTLY THAT WAS THE  
25 SUBJECT OF THIS LAWSUIT. I DIDN'T EVEN KNOW THE  
26 EXISITENCE OF THIS LAWSUIT UP UNTIL THEN AND THAT WAS  
27 A FEW DAYS AGO AND I THOUGHT AGAIN ABOUT IT AND  
28 RECALLED THINKING AT THE TIME. NOW, WHEN IT WAS OVER



1 THE LAST THREE YEARS, I COULDN'T TELL YOU. I  
2 COULDN'T TELL YOU WHERE IT WAS OR WHEN. BUT THAT'S  
3 ALL. I THINK THAT THAT WAS MY OWN IDEA. THAT IS,  
4 THE SPECULATION OF HOW IT COULD TECHNICALLY BE DONE.  
5 NO ONE SUGGESTED IT TO ME, THAT I RECALL.

6 Q. WHAT WAS THE SUBSTANCE THAT YOU  
7 CONCLUDED COULD BE USED TO DO THIS?

8 A. WELL, I THINK I'VE EXPLAINED THAT, YOU  
9 KNOW, CHEMICALLY SUCH A THING COULD EXIST AND THAT'S  
10 HOW SUCH A THING COULD BE DONE. IF IT WAS INDEED AN  
11 INTELLIGENCE OPERATION.

12 Q. OKAY. WHEN YOU SAY YOU CONCLUDED THAT  
13 CHEMICALLY IT COULD BE DONE, DID YOU REACH ANY  
14 CONCLUSION AS TO HOW THAT WOULD CHEMICALLY BE DONE?

15 A. WELL, I'VE EXPLAINED AS MUCH AS I  
16 SPECULATED ABOUT IT. YOU KNOW, IF -- FOR EXAMPLE, IF  
17 IT WAS A METAL CONTAINER -- I MEAN, YOU'RE GOING TO  
18 HAVE A METAL CONTAINER LEFT OVER BECAUSE THE GASOLINE  
19 IS NOT GOING TO EAT UP THE METAL. HOWEVER, IF IT IS  
20 A SUBSTANCE THAT THROUGH TIME OR THROUGH AGITATION  
21 PERHAPS IN THE GASOLINE MEDIUM IS ABLE TO DISSOLVE,  
22 THEN THE THING IS POSSIBLE. THAT'S THE ONLY IDEA I  
23 CAME UP WITH. NOW, AS FAR AS IF THERE EVEN EXISTS A  
24 CHEMICAL THAT COULD DO THAT, IF THERE IS A SUBSTANCE,  
25 I DON'T KNOW. I'M NOT A CHEMIST.

26 Q. SO YOU DON'T KNOW WHETHER THERE IS OR  
27 THERE ISN'T; IS THAT CORRECT?

28 A. I'M ONLY TELLING YOU --

1 MR. MARTINEZ: I THINK HE WAS GIVING YOU A  
2 SPECULATION.

3 THE WITNESS: RIGHT. ALL I CAN GIVE YOU IS  
4 SPECULATION BECAUSE I HAVE NEVER EVEN SEEN HIS PLANE.  
5 I HAVE NEVER DEALT WITH CHEMICALS. I HAVE NEVER HAD  
6 THE INTENT TO DO SUCH A THING OR HARM ANYONE SO --  
7 HOWEVER, I AM SUFFICIENTLY INTELLIGENCE ORIENTED TO  
8 KNOW THAT GIVEN THE LEVEL OF TECHNOLOGY, IT'S  
9 POSSIBLE.

10 BY MS. O'MELVENY:

11 Q. OTHER THAN THIS SPECULATION THAT YOU  
12 WERE ENGAGED IN YOURSELF, YOU HAVE NO RECOLLECTION OF  
13 DISCUSSING THE PARTICULARS WITH MR. FLYNN; IS THAT  
14 CORRECT?

15 A. NO.

16 Q. NOW, YOU SAID THAT YOU DID NOT KNOW  
17 ABOUT THIS LAWSUIT UNTIL A FEW DAYS AGO WHEN THE  
18 MATTER OF YOUR DEPOSITION CAME TO YOUR ATTENTION.  
19 WHAT IS YOUR BEST RECOLLECTION AS YOU SIT HERE TODAY  
20 OF THE LAST OCCASION THAT YOU AND MR. FLYNN DISCUSSED  
21 THE MATTER OF HIS AIRPLANE AND ITS ACTIVITY OR  
22 EXPERIENCES IN 1979?

23 A. OH, I DON'T KNOW. TWO HOURS AGO.

24 (BRIEF INTERRUPTION)

25 MR. MARTINEZ: CAN WE TAKE A SHORT BREAK?

26 (BRIEF RECESS)

27 MS. O'MELVENY: COULD YOU READ BACK THE LAST  
28 QUESTION, PLEASE.



1 (RECORD READ)

2 BY MS. O'MELVENY:

3 Q. DURING YOUR DISCUSSION WITH MR. FLYNN  
4 TWO HOURS AGO, DID YOU DISCUSS THE TESTIMONY YOU  
5 WOULD BE GIVING?

6 MR. MARTINEZ: OBJECTION. I THINK THAT'S  
7 ATTORNEY/CLIENT PRIVILEGE.

8 THE WITNESS: WELL, WE ALREADY ANSWERED THAT.  
9 THAT'S WHY WE CALLED HIM. IT WAS TO DETERMINE  
10 WHETHER OR NOT WE WOULD WAIVE IT FOR THIS PURPOSE.

11 BY MS. O'MELVENY:

12 Q. I UNDERSTAND. BUT YOU CALLED TO  
13 DISCUSS WHETHER THERE WAS GOING TO BE ANY CLAIM OF  
14 PRIVILEGE. WHAT I AM ASKING IS WHETHER YOU AND HE  
15 REVIEWED ANY PARTICULAR STATEMENT THAT YOU WOULD MAKE?

16 A. NO. THE ONLY THING WE DISCUSSED WAS  
17 WHETHER OR NOT WE WERE GOING TO WAIVE IT.

18 Q. OKAY. OTHER THAN YOUR DISCUSSION WITH  
19 MR. FLYNN TWO HOURS AGO, AND OTHER THAN YOUR LEARNING  
20 OF THIS DEPOSITION A FEW DAYS AGO, WHEN DID YOU LAST  
21 DISCUSS WITH MR. FLYNN THE SUBJECT MATTER OF HIS  
22 AIRPLANE'S DIFFICULTIES IN OCTOBER OF 1979 AND THE  
23 POSSIBLE CAUSE?

24 A. SOMETIME -- IT COULD BE BEFORE; IT  
25 COULD BE AFTER THIS MEETING OR SPEECH. IN ANY CASE,  
26 IT IS PROBABLY NOT WITHIN THE LAST YEAR. AND  
27 WHENEVER -- YOU KNOW, I'VE ONLY TALKED TO HIM MAYBE,  
28 MAYBE TWO TIMES ABOUT IT. I DIDN'T ASK ANY QUESTIONS,

1 THAT I RECALL. IT WAS JUST, YOU KNOW, IT CAME UP.  
2 AND I CAN'T TELL YOU ANY MORE THAN WHAT I HAVE TOLD  
3 YOU.

4 Q. AND BY THIS SPEECH, WE ARE REFERRING  
5 TO THE SPEECH THAT MR. FLYNN GAVE IN JUNE OF 1983?

6 A. I ASSUME THAT'S -- NOW, I DON'T KNOW.  
7 ONE THAT TOOK PLACE IN SOME CHURCH SOMEWHERE.

8 Q. I DON'T KNOW WHERE IT TOOK PLACE, BUT  
9 CAN WE STIPULATE THAT THE SPEECH THAT IS AT ISSUE IN  
10 THIS LAWSUIT WAS GIVEN IN JUNE OF 1983?

11 MR. MARTINEZ: SURE.

12 THE WITNESS: IS THAT THE ONE THE CONTEMPT  
13 PROCEEDING AROSE OUT OF?

14 MS. O'MELVENY: I DON'T KNOW THE ANSWER TO  
15 THAT. I KNOW IT WAS A SPEECH TO THE GROUP WHICH IS  
16 KNOWN AS THE PHOENIX GROUP.

17 WHERE WAS THE LOCATION OF THE SPEECH  
18 YOU ARE TALKING ABOUT?

19 THE WITNESS: WHERE WAS THE LOCATION? I DON'T  
20 KNOW. AT SOME CHURCH.

21 BY MS. O'MELVENY:

22 Q. IS IT YOUR BEST RECOLLECTION AS YOU  
23 SIT HERE TODAY THAT YOU HAVE NOT DISCUSSED THE  
24 SUBJECTS OF MR. FLYNN'S AIRPLANE AND ITS DIFFICULTIES  
25 IN OCTOBER OF 1979 WITH MR. FLYNN ON MORE THAN ONE OR  
26 TWO OCCASIONS?

27 A. RIGHT.

28 Q. AND YOU DO NOT KNOW AS YOU SIT HERE



1       TODAY WHETHER THOSE OCCASIONS PRECEDED OR WERE  
2       SUBSEQUENT TO THIS SPEECH?

3               A.           MY FEELING IS THAT SOMETHING PRECEDED  
4       IT BECAUSE IF INDEED IT OCCURRED AT THE SPEECH, AND I  
5       HAVE NOT READ A TRANSCRIPT OF THE SPEECH, EXCEPT I  
6       SAW THE ORGANIZATION APPARENTLY HAD SOMEONE RECORD  
7       THE SPEECH, AND THEY WENT DOWN IMMEDIATELY TO A P.I.  
8       OR AN ATTORNEY OR SOMEONE; GOT THE THING TRANSCRIBED  
9       AND THEN BROUGHT A CONTEMPT ACTION AGAINST FLYNN  
10      WHICH WAS DISMISSED. THAT'S THE ONLY TRANSCRIPT THAT  
11      I'VE SEEN. IT'S ONE PREPARED BY SOMEONE WITHIN THE  
12      ORGANIZATION, AND ALL I SAW, I BELIEVE, WAS PART OF  
13      IT WHICH PERTAINED TO THE CONTEMPT ACTION.

14              MS. O'MELVENY:   MOVE TO STRIKE THE ANSWER AS  
15      NONRESPONSIVE.

16                      COULD I HAVE READ BACK THE QUESTION,  
17      PLEASE.

18              THE WITNESS:   SO, ANYWAY, SOMETHING PRECEDES  
19      THAT BECAUSE I BELIEVE THAT I KNEW ABOUT THE INCIDENT  
20      AT THAT TIME.

21                      SOMETHING FOLLOWS IT BECAUSE I RECALL  
22      SOMETIME LATER WONDERING ABOUT DURING A CONVERSATION  
23      THE METHOD AND THAT'S ALL. THAT'S ABOUT ALL THE  
24      COMMUNICATIONS I'VE HAD. SOMEONE ELSE MAY HAVE ASKED  
25      ME ABOUT IT, "DID I THINK IT WAS TRUE?" BUT I  
26      COULDN'T EVEN TELL YOU WHO. AND I WOULD HAVE TOLD  
27      THEM AND, IN FACT, I DID TELL THEM EXACTLY AS I'VE  
28      TOLD YOU. CIRCUMSTANTIAL EVIDENCE. I DO NOT

1 DISCOUNT IT BECAUSE I KNOW THE WAY THEY OPERATE. I  
2 KNOW WHAT THEY'VE DONE TO ME. BUT AS FAR AS PROOF, I  
3 DON'T HAVE ANY.

4 BY MS. O'MELVENY:

5 Q. DID MR. FLYNN EVER STATE TO YOU THAT  
6 HE HAD OBTAINED DIRECT PROOF THAT ANY INDIVIDUAL  
7 ASSOCIATED WITH THE CHURCH OF SCIENTOLOGY OF  
8 CALIFORNIA OR ANY SCIENTOLOGY ENTITY HAD PLACED  
9 BALOONS OR CYLINDERS OF ANY TYPE IN THE FUEL TANKS OF  
10 HIS AIRPLANE?

11 A. NOW, THAT'S BEEN ANSWERED BUT, NO.

12 Q. DID MR. FLYNN EVER TELL YOU THAT HE  
13 HAD OBTAINED ANY DIRECT EVIDENCE OF ANY KIND THAT THE  
14 DIFFICULTIES HIS AIRPLANE EXPERIENCED IN OCTOBER OF  
15 1979 WERE CAUSED BY HUMAN INTERVENTION?

16 A. I --

17 MR. MARTINEZ: I WILL OBJECT TO THE QUESTION.  
18 I DON'T KNOW WHAT YOU MEAN BY "DIRECT EVIDENCE."

19 BY MS. O'MELVENY:

20 Q. DID --

21 THE WITNESS: ANYWAY, HE NEVER SAID THAT, THAT  
22 I RECALL.

23 MS. O'MELVENY:

24 Q. DID HE EVER TELL YOU THAT HE HAD  
25 EVIDENCE OF ANY KIND THAT IT WAS CAUSED BY HUMAN  
26 INTERVENTION?

27 A. I DON'T --

28 MR. MARTINEZ: SAME OBJECTION. THE WORD



1 "EVIDENCE" IS CAPABLE OF MANY MEANINGS.

2 THE WITNESS: HE NEVER USED THE WORDS "HUMAN  
3 INTERVENTION."

4 BY MS. O'MELVENY:

5 Q. I AM NOT ASKING YOU IF HE USED THE  
6 PRECISE WORDS.

7 A. I KNOW WHAT YOU'RE ASKING. REALLY --

8 Q. IN SUBSTANCE WHETHER OR NOT HE USED  
9 THE WORDS "HUMAN INTERVENTION"?

10 A. LET ME IMPRESS UPON YOU I HAVE TOLD  
11 YOU EVERYTHING THAT I KNOW ABOUT THE INCIDENT AND  
12 ABOUT COMMUNICATIONS WITH MICHAEL FLYNN AND ABOUT  
13 ANYONE REGARDING THE INCIDENT.

14 Q. AM I CORRECT IN UNDERSTANDING THAT YOU  
15 HAVE, OVER THE LAST FEW YEARS, TURNED OVER TO  
16 MR. FLYNN MANY THOUSANDS OF DOCUMENTS?

17 A. WHAT IS "THE LAST FEW YEARS"?

18 Q. BETWEEN 1981 AND TODAY.

19 A. THE -- I HAVE SENT DOCUMENTS TO  
20 MICHAEL FLYNN.

21 Q. DO YOU KNOW HOW MANY DOCUMENTS?

22 A. WELL, I -- YOU KNOW, I HESITATE TO  
23 GIVE AN AMOUNT BECAUSE THIS HAS BEEN LITIGATED  
24 EXTENSIVELY, AND I THINK THAT THE RECORD IN THAT CASE,  
25 WHICH IS AVAILABLE TO YOUR CLIENT, IS CLEAR AS TO  
26 WHAT DOCUMENTS WERE INVOLVED, ET CETERA, ET CETERA.  
27 I DO NOT -- I'M NOT GOING TO CONTINUE TO BE HARASSED  
28 AND FORCED TO ANSWER QUESTIONS REGARDING THIS THING

1 WHICH HAS BEEN LITIGATED. IT'S OVER AND DONE WITH.

2 Q. I'M NOT ASKING QUESTIONS ABOUT MATTERS  
3 THAT ARE INVOLVED IN ANY OTHER LITIGATION. I'M  
4 ASKING YOU IF YOU HAVE ANY ESTIMATE OF THE NUMBER OF  
5 DOCUMENTS THAT YOU HAVE TURNED OVER TO MR. FLYNN?

6 A. YOU MEAN, OTHER THAN ANYTHING THAT HAS  
7 BEEN THE SUBJECT OF ANY LITIGATION?

8 Q. NO. I MEAN, IN THE COURSE OF THE LAST  
9 FOUR YEARS.

10 MR. MARTINEZ: WHAT IS THE RELEVANCE OF THAT?

11 MS. O'MELVENY: IT'S A FOUNDATIONAL QUESTION.

12 THE WITNESS: THE WHOLE THING HAS BEEN  
13 LITIGATED. I'VE SENT HIM DOCUMENTS. I'VE SENT HIM  
14 SEVERAL THOUSAND DOCUMENTS, BUT I JUST DON'T WANT TO  
15 BE CONTINUED TO BE BADGERED ABOUT IT BECAUSE THAT'S  
16 NOT THE WAY THE LAW WORKS.

17 BY MS. O'MELVENY:

18 Q. DID ANY OF THE DOCUMENTS WHICH YOU  
19 SENT TO OR GAVE TO MR. FLYNN MAKE ANY MENTION OF ANY  
20 ATTEMPT TO SABOTAGE MR. FLYNN'S AIRPLANE?

21 A. BEFORE I ANSWER, AND THE ANSWER IS NO,  
22 LET ME AGAIN SAY THESE THINGS HAVE ALL BEEN ANSWERED.  
23 YOU ASKED THE SAME QUESTION. TO JUST REWORD IT IN  
24 ANOTHER QUESTION DOESN'T MAKE ANY SENSE WHATSOEVER.

25 MR. MARTINEZ: THE DOCUMENTS SPEAK FOR  
26 THEMSELVES.

27 MS. O'MELVENY: I MOVE TO STRIKE THE WITNESS'  
28 ANSWER AFTER "THE ANSWER IS NO."



1 THE WITNESS: HOWEVER --

2 MS. O'MELVENY: THERE IS NO PENDING QUESTION.

3 THE WITNESS: AND I WILL PUT IN THE RECORD  
4 THAT, HOWEVER, THOSE DOCUMENTS ARE PROBABLY GERMANE  
5 TO THIS CASE BECAUSE THEY DO SHOW THE PATTERN OF THE  
6 ORGANIZATION, AND THEY DO SHOW HUBBARD'S CONTROL, AND  
7 THEY DO SHOW THE STATE OF THE MAN'S MIND. HIS  
8 VINDICTIVENESS AND HIS PROPENSITY FOR ENGAGING IN  
9 THAT TYPE OF ACTIVITY TO DESTROY ENEMIES. SO THEY  
10 SHOW THAT. I'VE ALREADY STATED THAT I HAVE NEVER  
11 SEEN ANY DOCUMENT SPECIFICALLY ON THE AIRPLANE  
12 INCIDENT. BUT AS FAR AS THEIR RELEVANCY IN THIS CASE,  
13 I THINK SO.

14 MS. O'MELVENY: THERE WAS NO PENDING QUESTION,  
15 BUT I MOVE TO STRIKE THE WITNESS' REMARK.

16 THE WITNESS: I MOVE TO REINSTATE.

17 BY MS. O'MELVENY:

18 Q. HOW MANY AFFIDAVITS HAVE YOU PREPARED  
19 REGARDING YOUR ACTIVITIES IN SCIENTOLOGY OR YOUR  
20 KNOWLEDGE ABOUT SCIENTOLOGY MATTERS?

21 A. SEVERAL.

22 Q. DO YOU KNOW HOW MANY?

23 A. I REALLY DON'T. YOU KNOW --

24 Q. MORE THAN 10?

25 A. IT'S POSSIBLE. IT COULD EVEN BE 20.

26 Q. HAVE ANY OF THOSE AFFIDAVITS CONTAINED  
27 ANY REFERENCE TO MR. FLYNN'S AIRPLANE AND ITS FATE IN  
28 OCTOBER OF 1979?



1           A.           BOY, I DON'T BELIEVE SO. YOU KNOW,  
2           YOU'RE REALLY GOING TO SURPRISE ME IF YOU HAUL OUT A  
3           DOCUMENT THAT HAS MY SIGNATURE ON IT. BUT THERE'S  
4           NOTHING -- IT DOESN'T -- I DON'T BELIEVE SO. THERE'S  
5           NO REASON UNLESS THERE'S SOME OTHER TIE IN. YOU KNOW,  
6           I'VE AUTHORED DOCUMENTS REGARDING OPERATIONS THAT I  
7           KNEW ABOUT OR OPERATIONS IN WHICH I WAS THE TARGET,  
8           BUT I DON'T RECALL ANY ON THIS PARTICULAR THING.

9           Q.           AM I CORRECT IN UNDERSTANDING THAT YOU  
10          WERE NOT INVOLVED IN ANY OPERATIONS THAT FOCUSED ON  
11          OR WERE DIRECTED TOWARD MR. FLYNN'S AIRPLANE?

12          A.           I BELIEVE I'VE ANSWERED THAT MANY  
13          TIMES.

14          Q.           I BELIEVE YOU HAVE, BUT ONE OF THE  
15          PROBLEMS WITH VOLUNTEERING ANSWERS TO QUESTIONS IS  
16          YOU MAKE STATEMENTS THAT HAVE TO BE FOLLOWED UP ON.

17                        SO IF YOU WOULD READ BACK THE WITNESS'  
18          ANSWER TO THAT QUESTION, I WOULD APPRECIATE IT.

19          THE WITNESS: TO WHICH QUESTION? THE ONE WAY  
20          BACK WHEN YOU ASKED THE SAME THING?

21                        (RECORD READ)

22          THE WITNESS: SO WHAT DOES THAT HAVE TO DO  
23          WITH OPERATIONS THAT I WAS INVOLVED IN AGAINST  
24          MICHAEL FLYNN?

25          BY MS. O'MELVENY:

26          Q.           AM I CORRECT IN UNDERSTANDING THAT OF  
27          YOUR OWN PERSONAL KNOWLEDGE YOU KNOW OF NO OPERATION  
28          DIRECTED TOWARD MR. FLYNN'S AIRPLANE?



1 A. THAT'S CORRECT.

2 Q. AND AM I CORRECT THAT OF YOUR OWN  
3 PERSONAL KNOWLEDGE YOU KNOW OF NO ACTIVITIES IN WHICH  
4 MR. FLYNN'S AIRPLANE WAS THE TARGET OF ANY SABOTAGE  
5 ATTEMPT?

6 A. CAN YOU REREAD THAT QUESTION?

7 (RECORD READ)

8 MR. MARTINEZ: SCIENTOLOGY ACTIVITIES? WHOSE  
9 ACTIVITIES?

10 MS. O'MELVENY: I'M SORRY. READ BACK THE  
11 QUESTION, PLEASE.

12 (RECORD READ)

13 MS. O'MELVENY: ANY ACTIVITIES INVOLVING  
14 ANYONE AFFILIATED WITH THE CHURCH OF SCIENTOLOGY OF  
15 CALIFORNIA OR ANY SCIENTOLOGY ENTITY.

16 THE WITNESS: THE ANSWER IS, I DON'T HAVE ANY  
17 PERSONAL KNOWLEDGE AND I WOULD REITERATE FOR PERHAPS  
18 THE DOZENTH TIME THAT I DON'T. AND YOU CAN COVER IT  
19 FROM AS MANY ANGLES AS YOU WANT, AND YOU CAN CONTINUE  
20 TO BADGER ME ON THE SUBJECT, BUT I DON'T HAVE ANY  
21 PERSONAL KNOWLEDGE. I'M ABSOLUTELY POSITIVE THAT  
22 MICHAEL FLYNN WILL ALSO NOT BE ASKING ME ANYTHING  
23 ABOUT PERSONAL KNOWLEDGE ABOUT THE PLANE INCIDENT.

24 SO, YOU KNOW, WE CAN CONTINUE TO WASTE  
25 TIME ABOUT THIS THING, BUT HE WILL NOT, I'M SURE,  
26 BECAUSE I HAVE NO PERSONAL KNOWLEDGE. AND I'VE  
27 STATED IT MANY TIMES. AND AFTER A WHILE, UNLESS  
28 YOU'RE JUST INTENDING THIS TO TRIP ME UP IN SOME WAY,

1 IT BECOMES HARASSIVE.

2 MS. O'MELVENY: MOVE TO STRIKE THE WITNESS'  
3 ANSWER.

4 THE WITNESS: REINSTATE.

5 BY MS. O'MELVENY:

6 Q. HAVE YOU GIVEN TESTIMONY IN  
7 DEPOSITIONS INVOLVING YOUR ACTIVITIES AND KNOWLEDGE  
8 OF SCIENTOLOGY ACTIVITIES?

9 A. YES.

10 Q. AND HAVE YOU, IN THE COURSE OF ANY  
11 DEPOSITIONS PRIOR TO TODAY, BEEN QUESTIONED ABOUT OR  
12 GIVEN TESTIMONY REGARDING MR. FLYNN'S AIRPLANE?

13 A. I DON'T RECALL IF I WAS. IT SEEMS  
14 DOUBTFUL. USUALLY, THE ORGANIZATION DOES NOT LIKE TO  
15 ASK QUESTIONS ABOUT ITS OPERATIONS. IT USUALLY  
16 AVOIDS THAT UNLESS THEY KNOW THAT THE DEPONENT DOES  
17 NOT HAVE ANY INFORMATION. SO I PROBABLY WAS NOT  
18 ASKED.

19 MS. O'MELVENY: MOVE TO STRIKE THE WITNESS'  
20 ANSWER AFTER THE WORD "DOUBTFUL."

21 MR. MARTINEZ: I WOULD ALSO LIKE TO RAISE A  
22 BELATED OBJECTION THAT THE RECORD IS IN THOSE  
23 DEPOSITIONS IN TRIAL TESTIMONY OR WHATEVER WILL SPEAK  
24 FOR THEMSELVES.

25 BY MS. O'MELVENY:

26 Q. HAVE YOU GIVEN ANY INTERVIEWS TO  
27 MEMBERS OF THE MEDIA REGARDING YOUR ACTIVITIES IN  
28 SCIENTOLOGY OR YOUR KNOWLEDGE OF SCIENTOLOGY



1 ACTIVITIES?

2 A. YES.

3 Q. IN THE COURSE OF ANY OF THOSE  
4 INTERVIEWS, HAVE YOU DISCUSSED MR. FLYNN'S AIRPLANE  
5 AND THE INCIDENT IN OCTOBER OF 1979?

6 A. I CAN'T SAY FOR CERTAIN THAT I DID NOT  
7 BECAUSE SOMEONE MAY HAVE ASKED ME THAT. IF I WAS  
8 ASKED BY SOMEONE FROM THE PRESS IF THERE IS A RECORD  
9 OF SUCH A THING, I WOULD HAVE TOLD THEM EXACTLY WHAT  
10 I'VE BEEN SAYING THROUGHOUT THIS DEPOSITION.

11 Q. AS YOU SIT HERE TODAY, DO YOU HAVE ANY  
12 SPECIFIC RECOLLECTION OF ANY MEMBER OF THE MEDIA  
13 ASKING YOU A QUESTION ON THAT SUBJECT?

14 A. NO.

15 MS. O'MELVENY: COULD YOU GET FOR US A COPY OF  
16 DEFENDANT'S EXHIBIT 218 AND 219, PLEASE, WHICH ARE  
17 BOTH NEW YORK TIMES.

18 MR. MARTINEZ: I HAVE THE NEW YORK TIMES. IS  
19 THERE TWO NEW YORK TIMES?

20 MS. O'MELVENY: WELL, WHAT I WANT IS THE  
21 JANUARY 1983 NEW YORK TIMES, WHICH I THINK IS 218 OR  
22 219.

23 MR. MARTINEZ: I KNOW WHAT YOU'RE TALKING  
24 ABOUT.

25 (BRIEF RECESS)

26 BY MS. O'MELVENY:

27 Q. HAVE YOU GIVEN ANY SPEECHES REGARDING  
28 YOUR ACTIVITIES IN SCIENTOLOGY OR THE ACTIONS OF

1 SCIENTOLOGY?

2 A. DEFINE A "SPEECH."

3 Q. HAVE YOU ADDRESSED ANY GROUP OF PEOPLE  
4 ON THAT SUBJECT MATTER?

5 A. YES.

6 Q. HAVE YOU, IN THE COURSE OF ANY OF  
7 THOSE DISCUSSIONS, MADE MENTION OF THE AIRPLANE  
8 INCIDENT AS DESCRIBED BY MR. FLYNN?

9 A. I DON'T BELIEVE SO. UNLESS, AGAIN,  
10 SOMEONE ASKED ME. YOU KNOW, I'VE NEVER REALLY GIVEN  
11 A SPEECH LIKE MICHAEL FLYNN'S SPEECH. I HAVE TALKED  
12 INFORMALLY TO PEOPLE ON VARIOUS OCCASIONS. USUALLY,  
13 THEY WANT TO KNOW ABOUT THE FRAUDULENT STATEMENTS BY  
14 L. RON HUBBARD AND WHAT'S CONTAINED IN THE RESEARCH  
15 THAT I DID FOR A COUPLE YEARS.

16 SO IF SOMEONE ASKED ME, I WOULD TELL  
17 THEM THE SAME STORY. BUT I NEVER, TO MY KNOWLEDGE,  
18 EVER TALKED TO ANY GROUP ABOUT IT. IN FACT, THE ONLY  
19 GROUP THAT I'VE EVER TALKED TO WOULD, AGAIN, BE ~~OVER~~  
20 ~~AROUND~~ A ROUND TABLE OR SITTING DOWN WITH A SMALL NUMBER OF  
21 PEOPLE. I'VE NEVER -- NO ONE HAS EVER ADVERTISED TO  
22 COME AND HEAR GERALD ARMSTRONG REGARDING MIKE FLYNN'S  
23 PLANE.

24 Q. HAVE YOU EVER HELD YOURSELF OUT TO  
25 ANYONE AS HAVING PERSONAL KNOWLEDGE OF ANY ACTIVITIES  
26 BY SCIENTOLOGY DIRECTED TOWARD MR. FLYNN'S AIRPLANE?

27 A. YOU KNOW, I'VE ANSWERED THIS SO MANY  
28 TIMES. NO.



1 Q. HAVE YOU SPOKEN TO GOVERNMENTAL  
2 INVESTIGATORS ABOUT YOUR ACTIVITIES IN SCIENTOLOGY OR  
3 THE ACTIVITIES OF SCIENTOLOGY?

4 A. YES.

5 Q. HAVE YOU DISCUSSED WITH ANY  
6 REPRESENTATIVES OF ANY GOVERNMENTAL AGENCY THE  
7 INCIDENTS INVOLVING MR. FLYNN'S PLANE AS CHARGED BY  
8 MR. FLYNN?

9 A. AGAIN, IF ANYONE ASKED ME I WOULD HAVE  
10 SAID WHAT I SAID. I DON'T RECALL BEING ASKED.  
11 PERHAPS I OUGHT TO TAKE THE SUBJECT UP.

12 Q. BUT AS YOU SIT HERE TODAY, YOU HAVE NO  
13 RECOLLECTION OF ANY REPRESENTATIVE OF ANY  
14 GOVERNMENTAL AGENCY ASKING YOU QUESTIONS ON THAT  
15 SUBJECT?

16 A. NO.

17 Q. ARE YOU FAMILIAR WITH AN INDIVIDUAL  
18 NAMED LAUREL SULLIVAN?

19 A. YOU'RE NOT THINKING OF THE LAUREL  
20 SULLIVAN ARE YOU? YEAH, I KNOW HER.

21 Q. HAS LAUREL SULLIVAN EVER TOLD YOU THAT  
22 SHE KNEW OF, OR WAS INVOLVED IN ANY WAY, IN ANY  
23 EFFORT TO SABOTAGE MR. FLYNN'S AIRPLANE?

24 A. NO.

25 Q. HAVE YOU EVER DISCUSSED MR. FLYNN'S  
26 CHARGES REGARDING HIS AIRPLANE WITH LAUREL SULLIVAN?

27 A. NOT THAT I RECALL. BUT IF SHE TURNS  
28 OUT TO BE THE ONE, THEN WHATEVER I SAID IS WHAT I'VE

1 SAID TO YOU.

2 Q. DO YOU KNOW AN INDIVIDUAL BY THE NAME  
3 OF PAULETTE COOPER?

4 A. YEP.

5 Q. HAVE YOU AND MISS COOPER EVER  
6 DISCUSSED MR. FLYNN'S CHARGES REGARDING HIS AIRPLANE?

7 A. NO.

8 Q. HAS MISS COOPER EVER STATED TO YOU  
9 THAT SHE HAD ANY PERSONAL KNOWLEDGE REGARDING THE  
10 INCIDENT MR. FLYNN ALLEGES REGARDING HIS AIRPLANE?

11 A. JUST SO WE CAN GET THIS STRAIGHT, I  
12 DON'T BELIEVE THAT I'VE EVER SPOKEN TO MISS COOPER  
13 AND NEVER CORRESPONDED WITH MISS COOPER. BUT NOW  
14 THAT YOU BRING HER NAME UP, I --

15 Q. BUT NOW THAT I BRING HER NAME UP, WHAT?

16 A. I THINK IT WOULD PROBABLY BE SENSIBLE  
17 IF I DID.

18 Q. IF I WERE TO ASK YOU THE SAME  
19 QUESTIONS WITH REGARD TO AN INDIVIDUAL NAMED WARREN  
20 FRISKE, WOULD YOUR ANSWERS BE THE SAME?

21 A. SAME AS WHAT?

22 Q. WE WILL GO THROUGH EACH QUESTION.  
23 DO YOU KNOW MR. FRISKE?

24 A. NO.

25 Q. HAVE YOU EVER HAD ANY CONVERSATIONS  
26 WITH MR. FRISKE --

27 MR. MARTINEZ: WAIT A MINUTE.

28 THE WITNESS: LET'S BACK UP ON THAT ONE.



1 BY MS. O'MELVENY:

2 Q. HAVE YOU EVER BEEN TOLD BY ANYONE THAT  
3 MR. FRISKE HAD PERSONAL KNOWLEDGE REGARDING THE  
4 AIRPLANE INCIDENT AS CHARGED BY MR. FLYNN?

5 A. NO, I DON'T BELIEVE SO.

6 Q. DO YOU KNOW AN INDIVIDUAL BY THE NAME  
7 OF WILIAM FRANKS?

8 A. YES.

9 Q. HAVE YOU EVER DISCUSSED MR. FLYNN'S  
10 AIRPLANE OR THE AIRPLANE INCIDENT WITH MR. FRANKS?

11 A. I DON'T BELIEVE SO. JUST, YOU KNOW --

12 Q. THAT'S WHY I WAS TRYING TO SHORTCUT A  
13 LOT OF THESE QUESTIONS BY JUST --

14 A. IF YOU RUN DOWN THE LIST, WE WILL TAKE  
15 A READ. BUT YOU CAN RUN DOWN THE LIST AS FAR AS YOU  
16 WANT. THERE IS NO ONE -- I'LL REITERATE. THIS IS AT  
17 LEAST 13 NOW. THERE IS NO ONE THAT I RECALL  
18 COMMUNICATING WITH ABOUT THIS SUBJECT. SO YOU CAN  
19 PUT THE WHOLE UNITED STATES OF AMERICA AND THE REST  
20 OF THE WORLD ON A LIST. THERE'S NO ONE OTHER THAN  
21 MIKE FLYNN AND EVEN THOSE COMMUNICATIONS ARE ONLY  
22 WHAT I'VE STATED.

23 Q. AND YOU HAVE NOT HEARD FOR ANY OF THE  
24 INDIVIDUALS THAT WE HAVE DISCUSSED SO FAR, THAT ANY  
25 OF THEM HAVE PERSONAL KNOWLEDGE OF THIS INCIDENT?

26 A. SO WE CAN SHORTEN THIS THING, I HAVE  
27 NEVER HEARD OF ANYONE WITH PERSONAL KNOWLEDGE.

28 Q. ALL RIGHT. LET ME JUST RUN DOWN THE

1 NAMES AND YOU CAN CORRECT ME IF THERE IS ANY REASON  
2 YOUR ANSWERS WOULD NOT BE THE SAME.

3 VALERIE STAN<sup>S</sup>FIELD? MANFRED  
4 STAN<sup>S</sup>FIELD? RONALD DE WOLF? KIMA DOUGLAS? DIANE  
5 VALGEDING? HOWARD SCHOMER? EDWARD WALTERS? PAT  
6 BROECKER --

7 A. THAT NAME'S FAMILIAR.

8 Q. BUT THAT'S NOT THE QUESTION.

9 SO FAR YOUR SILENCE IS AN INDICATION  
10 THAT YOU HAVE NOT DISCUSSED THIS INCIDENT WITH ANY OF  
11 THESE PEOPLE NOR HEARD THAT THEY HAVE PERSONAL  
12 KNOWLEDGE REGARDING IT?

13 A. RIGHT. LET ME JUST MAKE IT REAL CLEAR  
14 BECAUSE I KNOW THAT I HAVE NOT BEEN MAKING MYSELF  
15 CLEAR BECAUSE I KEEP BEING ASKED THE SAME QUESTION.

16 THERE IS NO ONE THAT I RECALL TALKING  
17 TO ABOUT THIS. HOWEVER, IF I DID TALK TO ANYONE,  
18 THEN THAT'S WHAT I'VE SAID. BUT I DON'T RECALL  
19 TALKING TO ANYONE ABOUT IT, EVEN THOUGH I MAY HAVE,  
20 BECAUSE I HAVE KNOWN OF THE PLANE INCIDENT AND I'M  
21 NOT RELUCTANT TO TALK TO ANYONE ABOUT IT. IT HAS  
22 JUST, TO MY KNOWLEDGE, NEVER COME UP. IT'S NOT  
23 SOMETHING THAT I'VE DISCUSSED.

24 Q. AND YOU HAVE NOT HEARD THAT THESE  
25 INDIVIDUALS HAVE ANY PERSONAL KNOWLEDGE REGARDING  
26 THIS MATTER; IS THAT CORRECT?

27 A. JUST SO WE'RE REAL CLEAR.

28 Q. I WANT TO BE REAL CLEAR.



1           A.           JOIN SCIENTOLOGY.

2                       I HAVE NO PERSONAL KNOWLEDGE AND I  
3   KNOW OF NO ONE WHO HAS ANY PERSONAL KNOWLEDGE. I'VE  
4   NEVER SEEN ANY CORRESPONDENCE REGARDING THE INCIDENT.  
5   I KNOW OF NOTHING OTHER THAN WHAT I'VE SAID. BUT I  
6   AM QUITE -- YOU KNOW, I'M WILLING TO PURSUE THIS AS  
7   LONG AS WE DON'T GO PAST FIVE.

8                       I NEED TO TAKE A BREAK. I'VE GOT AN  
9   URGENT PHONE CALL.

10                      (BRIEF RECESS)

11                      THE WITNESS: FIRE AWAY.

12                      MS. O'MELVENY: WOULD YOU READ BACK THE LAST  
13   QUESTION.

14                      (RECORD READ)

15   BY MS. O'MELVENY:

16                      Q.           WOULD YOUR ANSWER BE THE SAME WITH  
17   RESPECT TO AN INDIVIDUAL NAMED PAT BROECKER?

18                      A.           YES.

19                      Q.           WOULD YOUR ANSWER BE THE SAME WITH  
20   RESPECT TO AN INDIVIDUAL NAMED ANN BROECKER?

21                      A.           YES.

22                      Q.           WOULD YOUR ANSWER BE THE SAME WITH  
23   RESPECT TO AN INDIVIDUAL NAMED JANE KEMBER?

24                      A.           YES.

25                      Q.           WOULD YOUR ANSWER BE THE SAME WITH  
26   RESPECT TO AN INDIVIDUAL NAMED DAVID MISCAVAGE?

27                      A.           YES.

28                      Q.           WOULD YOUR ANSWER BE THE SAME WITH AN

1 INDIVIDUAL NAMED MARY SUE HUBBARD?

2 A. YES.

3 Q. DID YOU EVER DO ANY WORK WITH MARY SUE  
4 HUBBARD WHEN YOU WERE INVOLVED IN SCIENTOLOGY?

5 A. WHAT DO YOU MEAN BY "WORK WITH"? I  
6 WAS ON A SHIP SAME TIME SHE WAS ON THE SHIP. I WAS  
7 AT DAYTONA WHEN SHE WAS THERE. I WAS AT <sup>ASTRA</sup> ~~ATRA~~ IN  
8 CULVER CITY WHEN SHE WAS THERE. I WAS AT LA <sup>QUINTA</sup> ~~KINTA~~,  
9 SHE WAS THERE OFF AND ON OR -- YEAH, LA <sup>QUINTA</sup> ~~KINTA~~. SO,  
10 YOU KNOW, I'VE WORKED IN THE GUARDIANS OFFICE FOR A  
11 WHILE WHICH SHE RAN UNDERNEATH HER HUSBAND AND HOW  
12 MUCH --

13 Q. DO YOU KNOW WHAT POSITION MARY SUE  
14 HUBBARD HELD IN 1979?

15 A. SHE WAS THE CONTROLLER.

16 Q. DO YOU KNOW WHAT POSITION -- I'M SORRY --  
17 WHAT DUTIES THAT POSITION INVOLVED?

18 A. WELL, SHE RAN THE GUARDIANS OFFICE.  
19 SHE WAS CSG, COMMODORE STAFF FOR THE GUARDIANS OFFICE.  
20 THE COMMODORE BEING L. RON HUBBARD. ALL MY  
21 COMMUNICATIONS TO HER WERE ROUTED EITHER C FOR  
22 CONTROLLER OR CSG, COMMODORE STAFF GUARDIAN.

23 Q. TO THE BEST OF YOUR KNOWLEDGE AND  
24 BELIEF, WAS MARY SUE HUBBARD KNOWLEDGEABLE ABOUT  
25 ACTIONS TAKEN BY THE GUARDIANS OFFICE DURING 1979?

26 A. I THINK MORE THAN SHE WOULD CARE TO  
27 ADMIT.

28 MS. O'MELVENY: WOULD YOU READ BACK THE



1 QUESTION, PLEASE.

2 (RECORD READ)

3 BY MS. O'MELVENY:

4 Q. CAN YOU ANSWER THAT YES OR NO?

5 A. IT'S TRUE EXACTLY AS IT IS TRUE WITH  
6 L. RON HUBBARD. YES, THEY BOTH KNEW.

7 Q. TO THE BEST OF YOUR KNOWLEDGE AND  
8 BELIEF, IF ANY ACTION HAD BEEN UNDERTAKEN BY THE  
9 GUARDIANS OFFICE TO SABOTAGE MR. FLYNN'S AIRPLANE IN  
10 1979, WOULD MARY SUE HUBBARD HAVE KNOWN ABOUT IT?

11 A. NOT NECESSARILY.

12 Q. AND WHEN YOU SAY "NOT NECESSARILY,"  
13 WAS THERE SOMEONE ELSE WHO WAS RUNNING THE GUARDIANS  
14 OFFICE BESIDES MARY SUE HUBBARD IN 1979?

15 A. L. RON HUBBARD.

16 Q. OTHER THAN L. RON HUBBARD AND MARY SUE  
17 HUBBARD WAS THERE SOMEONE ELSE --

18 A. PERHAPS I CAN EXPLAIN MY ANSWER.

19 MS. O'MELVENY: WOULD YOU READ BACK MY  
20 QUESTION.

21 (RECORD READ)

22 THE WITNESS: LET ME GIVE YOU SOMEONE'S --

23 BY MS. O'MELVENY:

24 Q. WAS THERE SOMEONE ELSE RUNNING THE  
25 GUARDIANS OFFICE?

26 A. THOSE WERE THE TWO. THEY RAN IN ORDER  
27 FROM L. RON HUBBARD TO MARY SUE HUBBARD TO JANE  
28 KEMBER. SO LET ME EXPLAIN BECAUSE --

1 Q. THERE'S NO PENDING QUESTION.

2 A. I DON'T THINK THAT YOU UNDERSTAND AS  
3 YET HOW THE ORGANIZATION OF SCIENTOLOGY OR GUARDIANS  
4 OFFICE FUNCTIONED.

5 Q. THERE IS NO PENDING QUESTION.

6 A. AND I ASSUME YOU DON'T CARE TO KNOW.

7 Q. DID YOU EVER SUGGEST IN WORDS OR  
8 SUBSTANCE TO MICHAEL FLYNN THAT IT WAS POSSIBLE THAT  
9 THE CHURCH OF SCIENTOLOGY HAD NOT ORDERED THE  
10 SABOTAGE OF THIS PLANE OR BEEN INVOLVED IN AN EFFORT  
11 TO SABOTAGE HIS PLANE?

12 A. THAT'S -- YOUR QUESTION IS WORDED A  
13 LITTLE DIFFICULT FOR ME TO ANSWER WITH A SIMPLE YES  
14 OR NO. I CAN TELL YOU WHAT I WOULD HAVE TRANSMITTED  
15 AND WHAT I MAY HAVE TRANSMITTED IN A COMMUNICATION  
16 WHICH PERHAPS LEAD ONE TO THAT CONCLUSION. IF YOU  
17 WANT ME TO ANSWER IT TO THE FULLEST EXTENT --

18 Q. YES.

19 A. -- AND THAT IS THIS: THE ORGANIZATION  
20 IS EXTREMELY COMPARTMENTALIZED. THEY HAVE A POLICY  
21 OF "NEED TO KNOW," SO THAT ANY GIVEN INDIVIDUAL  
22 INSIDE THE ORGANIZATION WHO DOES NOT NEED TO KNOW  
23 ABOUT A PARTICULAR ACTIVITY IS NOT GIVEN THAT  
24 INFORMATION.

25 THIS GENTLEMAN SITTING HERE, FOR  
26 EXAMPLE, IS NOT LET IN ON ALL THE ACTIVITIES IN WHICH  
27 THE ORGANIZATION IS INVOLVED. ADDITIONALLY, THERE IS  
28 A POLICY OF BYPASS BY WHICH SOMEONE AT THE TOP CAN



1 BYPASS SOMEONE MORE JUNIOR, AND HAVE SOMEONE BELOW  
2 THAT PERSON CARRY OUT AN ORDER. ADDITIONALLY, THERE'S  
3 THE POLICY OF THE ORGANIZATION TO USE OUTSIDE  
4 AGENCIES.

5 FOR EXAMPLE, NOW THAT THE  
6 PROLIFERATION OF THE PRIVATE ~~INVESTIGATION OR~~ <sup>INVESTIGATOR</sup> NETWORK  
7 BY THE ORGANIZATION WHERE THE PEOPLE INSIDE THE  
8 ORGANIZATION, THE SCIENTOLOGISTS, DO NOT KNOW THE  
9 ACTIVITIES IN WHICH THE P.I.'S ARE INVOLVED, AND  
10 ADDITIONALLY, YET ANOTHER POSSIBILITY IS THE  
11 INDEPENDENT ACTION BY SOMEONE WHO IS SEEKING TO  
12 DESTROY THE GREATEST ENEMY OF THE ORGANIZATION AND,  
13 HENCE, DO HIS PART TO SAVE THE PLANET FOR L. RON  
14 HUBBARD.

15 SO, IT IS VERY POSSIBLE THAT L. RON  
16 HUBBARD, NOT USING SCIENTOLOGY, NOT USING SCIENTOLOGY  
17 PERSONNEL, NOT INVOLVING THE GOVERNMENT OR NOT  
18 INVOLVING THE GUARDIANS OFFICE, NOT INVOLVING MARY  
19 SUE, COULD HAVE ARRANGED THE THING TOTALLY  
20 INDEPENDENTLY BECAUSE THAT IS THE WAY THE MAN WORKED.  
21 ADDITIONALLY, ANYONE INDIVIDUAL INSIDE THE  
22 ORGANIZATION COULD HAVE ARRANGED IT COMPLETELY  
23 WITHOUT THE KNOWLEDGE OF ANYONE ELSE IN SCIENTOLOGY.  
24 ADDITIONALLY, A CRAZY COULD HAVE DONE IT ALSO  
25 COMPLETELY WITHOUT THE KNOWLEDGE OF SCIENTOLOGY.  
26 SO --

27 Q. DID YOU EVER --

28 A. -- SO THESE POSSIBILITIES EXIST AND



1 THEY'VE EXISTED IN MY MIND BECAUSE I HAVE BEEN THE  
2 TARGET OF OPERATIONS BY THE ORGANIZATION OR BY PEOPLE  
3 OPERATING INDEPENDENTLY OR BY AGENCIES HIRED BY THE  
4 ORGANIZATION WHICH THE ORGANIZATION PERSONNEL WHO  
5 OUGHT TO KNOW DO NOT KNOW. <sup>3:50</sup> SO, I WOULD HAVE, IN ANY  
6 COMMUNICATION TO MICHAEL FLYNN, IF THE SUBJECT HAD  
7 COME UP, COMMUNICATED THAT REALITY TO HIM.

8 Q. DO YOU RECALL HAVING SUCH A  
9 COMMUNICATION WITH MR. FLYNN?

10 A. AGAIN, WHAT I DO RECALL TALKING TO  
11 MICHAEL FLYNN ABOUT IS THE POSSIBILITY OF IT BEING  
12 THE ORGANIZATION OR WHOEVER IT COULD HAVE BEEN, AND  
13 THE KNOWLEDGE THAT IT IS NOT BEYOND THEM. IN FACT,  
14 IT'S IN POLICY. POLICY WHICH IS REVERED BY THE  
15 ORGANIZATION. IT IS IN POLICY -- ONE OF THE MOST  
16 IMPORTANT POLICIES WITHIN THE ORGANIZATION IS  
17 SOMETHING CALLED THE RESPONSIBILITY OF LEADERS. <sup>3:52</sup> IT'S  
18 USUALLY REFERRED TO AS THE SIMON BOLIVAR POLICY <sup>3:53</sup> IN  
19 WHICH THE LEADER DOES NOT QUESTION WHEN A BODY IS  
20 DROPPED ON <sup>3:54</sup> ITS DOORSTEP.

21 YOU DON'T BUG THE LEADER WITH CRIMES  
22 COMMITTED FOR HIM. THE LEADER DOESN'T HAVE TO KNOW.  
23 IF HE IS INDEED A POWER AS HUBBARD SAYS, YOU JUST  
24 HANDLE AND REPORT. SO IT COULD HAVE BEEN A  
25 COMPLETELY INDEPENDENT -- AND THAT IS WHAT I WOULD  
26 HAVE COMMUNICATED TO MR. FLYNN. SIMPLY MY KNOWLEDGE  
27 OF THE ORGANIZATION AND THEIR PROPENSITY FOR THIS  
28 TYPE OF ACTIVITY.



1 MS. O'MELVENY: MOVE TO STRIKE THE WITNESS'  
2 ANSWER AS NONRESPONSIVE.

3 THE WITNESS: MOVE TO REINSTATE. I THINK I  
4 COMPLETELY ANSWERED THE QUESTION.

5 MS. O'MELVENY: READ BACK THE QUESTION, PLEASE.

6 (RECORD READ)

7 THE WITNESS: AND I ANSWERED THAT.

8 BY MS. O'MELVENY:

9 Q. YOU DESCRIBED A TELEX THIS MORNING  
10 FROM NORMAN STARKEY TO TERRI GAMBOA WHICH YOU STATED  
11 CONCERNED SURVEILLANCE OF MR. FLYNN'S OFFICES. DID  
12 YOU EVER DISCUSS THAT TELEX WITH MR. FLYNN?

13 A. I DON'T KNOW IF I DID OR NOT. MY  
14 RECOLLECTION IS THAT IT HAS COME UP IN AN EARLIER  
15 DEPOSITION BECAUSE I DO RECALL -- PERHAPS IT WAS EVEN  
16 IN ARMSTRONG IN THE TRIAL. I DO RECALL TALKING ABOUT  
17 IT, AND I THINK IT WAS EITHER A DEPOSITION OR IN  
18 TESTIMONY IN THE TRIAL.

19 Q. DO YOU HAVE ANY RECOLLECTION OF THE  
20 SUBJECT COMING UP IN A DISCUSSION WITH MR. FLYNN  
21 PRIOR TO TESTIMONY AT THE TRIAL?

22 A. NO RECOLLECTION.

23 Q. AND YOU DO NOT HAVE A SPECIFIC  
24 RECOLLECTION OF THE PRECISE TEXT OF THAT TELEGRAM; IS  
25 THAT CORRECT?

26 A. NOT THE PRECISE TEXT. I THINK I HAVE  
27 GIVEN YOU AS MUCH AS I POSSIBLY CAN ABOUT IT.

28 THE REASON THAT I RECALL IT, IF THAT'S



1 OF ANY --

2 Q. THERE'S NO PENDING QUESTION.

3 A. I'M PUTTING IT IN THE RECORD, THEN,  
4 BECAUSE I THINK IT MAY BE IMPORTANT. THE REASON I  
5 RECALL THIS PARTICULAR TELEX IN SOME DETAIL IS  
6 BECAUSE THE GUARDIANS OFFICE HIERARCHY WAS WIPED OUT  
7 IN 1981 AND WAS REPLACED WITH THE C.M.O. HIERARCHY.

8 AND THE PUBLIC RELATIONS LINE WHICH  
9 WAS PUT OUT REGARDING THE OLD GUARDIANS OFFICE WAS  
10 THAT THEY WERE A BUNCH OF CRIMINALS WHO, IN VIOLATION  
11 OF HUBBARD'S POLICY, HAD GONE AWRY, GONE A MUCK AND  
12 GOTTEN INVOLVED IN A WHOLE BUNCH OF ILLEGAL  
13 ACTIVITIES WHICH RESULTED IN THE FEDERAL CRIMINAL  
14 CASE. THIS WAS THE PUBLIC RELATIONS STATEMENTS PUT  
15 OUT TO US POOR FOOLS IN THE ORGANIZATION.

16 AND THEN THE NEXT THING WAS A  
17 STATEMENT THAT WE ARE NO LONGER DOING THAT SORT OF  
18 THING. WE'RE NOT INVOLVED IN INTELLIGENCE ACTIVITIES  
19 AND THIS WAS AGAIN PUT OUT BY THE C.M.O. AND TO ME  
20 THIS WAS A SHOCK TO SEE THAT TELEX BECAUSE IT  
21 INDICATED THAT INDEED THE SAME THING WAS GOING ON.  
22 THE SAME IDEA, THE SAME DETERMINATION TO HARASS AND  
23 DESTROY THEIR ENEMIES. AND I WAS TO SOME DEGREE  
24 SICKENED BY IT BECAUSE I HAD ATTEMPTED TO GET THE  
25 ORGANIZATION OUT OF THAT INTELLIGENCE MODE, OBVIOUSLY  
26 UNSUCCESSFULLY THROUGHOUT 1980 AND 1981.

27 SO IT STUCK IN MY MIND THAT HERE WAS  
28 THIS GROUP WHO WORKED DIRECTLY FOR L. RON HUBBARD AND



1 NOW THEY HAD TAKEN OVER ALL THE LITIGATION,  
2 PARTICULARLY IN THIS CASE, THE LITIGATION INVOLVING  
3 MICHAEL FLYNN, AND THAT THEY WERE INVOLVED IN EXACTLY  
4 THE SAME ACTIVITIES AS THE G.O. WHICH PRECEDED THEM.  
5 THEREFORE, IT STUCK IN MY MIND.

6 Q. WELL, AS I SAY, THERE WAS NO QUESTION  
7 PENDING SO I MOVE TO STRIKE ALL OF YOUR COMMENTS.

8 A. I MOVE TO REINSTATE.

9 Q. I WANT YOU TO TAKE A LOOK AT AN  
10 ARTICLE WHICH HAS BEEN PREVIOUSLY MARKED IN THIS CASE  
11 AS DEFENDANT'S EXHIBIT 219 FOR IDENTIFICATION. I  
12 WILL ASK YOU TO TAKE A LOOK AT IT AND TELL US WHETHER  
13 YOU HAVE SEEN THAT BEFORE.

14 A. DID YOU GUYS SUE THE NEW YORK TIMES?

15 Q. THE QUESTION IS: DID YOU SEE THAT  
16 DOCUMENT BEFORE?

17 A. YES, I HAVE.

18 Q. MAY I HAVE IT FOR A MOMENT.

19 WERE YOU INTERVIEWED BY MR. ROBERT  
20 LINDSEY BY THE NEW YORK TIMES --

21 A. YES.

22 Q. -- IN OR ABOUT JANUARY OF 1983?

23 A. YEP.

24 Q. TAKE A LOOK AT THE LAST PARAGRAPH  
25 WHICH I WILL, IN FACT, READ IT INTO THE RECORD.

26 QUOTE, "I THINK L. RON HUBBARD IS  
27 EITHER DEAD OR HE'S BEEN BEING KEPT LOCKED UP BY THIS  
28 GROUP OF PEOPLE WHO HAVE TAKEN OVER," END QUOTE --

1 COMMA MR. ARMSTRONG SAID.

2 IS THAT AN ACCURATE QUOTE?

3 A. IT'S PROBABLY OUT OF CONTEXT, BUT  
4 SOMETHING --

5 Q. DID YOU MAKE A STATEMENT TO THAT  
6 EFFECT TO MR. LINDSEY --

7 A. WHAT I WOULD HAVE SAID --

8 Q. -- AT THE NEW YORK TIMES?

9 A. I DON'T RECALL. THEY HAVE --  
10 DEFINITELY SOMETHING THAT OCCURRED TO ME ABOUT  
11 SOMETHING ABOUT SUITCASES STUFFED WITH 50-DOLLAR  
12 BILLS.

13 Q. LISTEN TO THE QUESTION. DID YOU MAKE  
14 A STATEMENT IN SUBSTANCE SUCH AS THAT WHICH I JUST  
15 READ TO YOU WHICH APPEARS IN THE LAST PARAGRAPH OF  
16 THIS ARTICLE IN THE NEW YORK TIMES?

17 A. YEP.

18 IS THAT ALL YOU CARE TO ASK ABOUT THAT?

19 MS. O'MELVENY: THAT IS ALL I CARE TO ASK  
20 ABOUT THAT, AND I HAVE NO FURTHER QUESTIONS.

21 THE WITNESS: THEN I WANT TO PUT SOMETHING ON  
22 THE RECORD AND THAT IS THIS: WHAT I SAID WAS THAT  
23 THE PEOPLE AT THE TOP OF THE ORGANIZATION, BECAUSE OF  
24 THE ACTIVITIES IN WHICH THEY ARE INVOLVED; BECAUSE OF  
25 THEIR DETERMINATION TO DESTROY PEOPLE AND BECAUSE OF  
26 THEIR DETERMINATION TO USE THE COURTS AS THEY DO TO  
27 DESTROY PEOPLE, THAT IN FACT, WHAT THEY HAVE CREATED  
28 IS A SITUATION IN WHICH L. RON HUBBARD IS KEPT IN



1 HIDING, THEY ARE IN FACT -- THE ORGANIZATION BECAUSE  
2 OF ITS ACTIVITIES IS, IN FACT, KEEPING HIM LOCKED UP.

3 NOW, THE OTHER POINT OF IT IS IT'S BY  
4 HIS OWN CHOOSING. BECAUSE THAT'S WHAT HE WANTS.  
5 BECAUSE HE IS THE FORCE BEHIND THEM. THEY HAPPEN TO  
6 BE STUPID ENOUGH TO CONTINUE TO USE THE COURTS AS A  
7 WEAPON TO ATTEMPT TO DESTROY PEOPLE. AND, IN FACT,  
8 ALL THEY HAVE ACHIEVED IS L. RON HUBBARD'S INABILITY  
9 TO MOVE ANYWHERE. BUT THAT'S WHAT HE WANTED. IT'S  
10 HIS DOING. HE CREATED IT. THEY'RE CARRYING OUT HIS  
11 OWN PARANOID PLAN. AND THE PARANOID ALWAYS SEEKS HIS  
12 OWN DESTRUCTION.

13 SO HE CREATED AN ORGANIZATION WHICH BY  
14 BRINGING ABSOLUTELY FRIVOLOUS STUPID LAWSUITS LIKE  
15 THIS ONE, FORCED THE MAN INTO HIDING, AND THEY KEEP  
16 HIM LOCKED UP. EVERY TIME THE ORGANIZATION LASHES  
17 OUT AT SOMEONE, L. RON HUBBARD GOES FURTHER INTO  
18 HIDING. AND IT'S BEEN A PATTERN ALL ALONG.

19 MS. O'MELVENY: WELL, AS INDICATED, I DIDN'T  
20 HAVE ANY MORE QUESTIONS. AND I, OF COURSE, MOVE TO  
21 STRIKE THOSE COMMENTS.

22 THE WITNESS: I MOVE TO REINSTATE IT.

23 MR. MARTINEZ: I HAVE NO QUESTIONS.

24 THE WITNESS: THAT'S IT?

25 MS. O'MELVENY: WE ARE DONE.

26 THE STIPULATION, I BELIEVE, IS THAT  
27 THE DEPOSITION TRANSCRIPT WILL BE SENT TO THE OFFICES  
28 OF MR. ARMSTRONG'S ATTORNEY, CONTOS AND BUNCH; SIGNED

1 BEFORE A NOTARY; RELIEVE THE REPORTER OF HER DUTIES.

2 THE REPORTER: MR. MARTINEZ, WOULD YOU LIKE A  
3 COPY?

4 MR. MARTINEZ: YES.

5

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OREGON

1 STATE OF ~~CALIFORNIA~~ )  
 2 ~~Multnomah~~ ) SS  
 3 COUNTY OF ~~LOS ANGELES~~ )  
 4

5 I, Cynthia J. Chandler A NOTARY PUBLIC IN  
 6 AND FOR THE STATE OF ~~CALIFORNIA~~ Oregon, DO HEREBY CERTIFY:

7 THAT ON THE 28th DAY OF February, 1985,  
 8 BEFORE ME PERSONALLY APPEARED GERALD DAVID ARMSTRONG,  
 9 THE WITNESS WHOSE DEPOSITION APPEARS HEREINBEFORE;

10 THAT THE SAID WITNESS WAS BY ME DULY ADVISED  
 11 OF THE RIGHT TO MAKE SUCH CHANGES AND CORRECTIONS IN  
 12 THE WITHIN DEPOSITION AS MIGHT BE NECESSARY IN ORDER  
 13 TO RENDER THE SAME TRUE AND CORRECT;

14 THAT THE SAID WITNESS STATED TO ME THAT THE  
 15 SAID DEPOSITION HAD BEEN READ TO OR BY SAID WITNESS,  
 16 AND HAVING MADE SUCH CHANGES AND CORRECTIONS AS WERE  
 17 DESIRED THEREUPON, SUBSCRIBED AND SWORE TO THE SAID  
 18 DEPOSITION IN MY PRESENCE.

19 IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED  
 20 MY NAME AND AFFIXED MY SEAL OF OFFICE THIS DATE ABOVE  
 21 WRITTEN.

22  
 23  
 24  
 25 Cynthia J. Chandler  
 26 NOTARY PUBLIC IN AND FOR THE  
 27 STATE OF ~~CALIFORNIA~~ Oregon  
 28 My Commission expires: 5/11/87

1 STATE OF CALIFORNIA )  
2 ) SS  
3 COUNTY OF LOS ANGELES )

4 I, VICKI ANNE MESHEKOW, A NOTARY PUBLIC IN  
5 AND FOR THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:

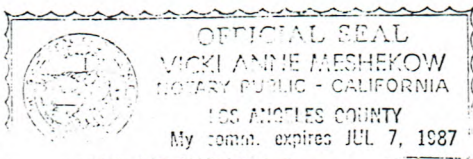
6 THAT PRIOR TO BEING EXAMINED, GERALD D.  
7 ARMSTRONG, THE WITNESS NAMED IN THE FOREGOING  
8 DEPOSITION, WAS BY ME DULY SWORN TO TESTIFY THE  
9 TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH;

10 THAT SAID DEPOSITION WAS TAKEN BEFORE ME  
11 PURSUANT TO NOTICE AND AGREEMENT, AT THE TIME AND  
12 PLACE THEREIN SET FORTH, AND WAS TAKEN DOWN BY ME IN  
13 SHORTHAND AND THEREAFTER TRANSCRIBED INTO TYPEWRITING  
14 UNDER MY DIRECTION AND SUPERVISION;

15 THAT IT WAS STIPULATED BY COUNSEL THAT SAID  
16 DEPOSITION MAY BE READ, CORRECTED AND SIGNED BY THE  
17 WITNESS BEFORE ANY NOTARY PUBLIC IN AND FOR THE STATE  
18 OF CALIFORNIA;

19 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL  
20 FOR, NOR RELATED TO, ANY PARTY TO SAID ACTION, NOR IN  
21 ANYWISE INTERESTED IN THE OUTCOME THEREOF.

22 IN WITNESS WHEREOF, I HAVE HEREUNTO  
23 SUBSCRIBED MY NAME AND AFFIXED MY SEAL THIS 9 DAY  
24 OF February, 1985.



*Vicki Anne Meshekow*  
NOTARY PUBLIC IN AND FOR THE  
STATE OF CALIFORNIA